



## **Establishing new food safety approach in EU accessing countries – Croatian challenges and opportunities**

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### **ABSTRACT**

*One of the basic goals of the Croatian agricultural policy is to enable consumers the access to the adequate and stable food offer that complies with their requirements, especially regarding food safety. Croatian National Food Safety Strategy, based on new EU food safety approach, is currently in the phase of discussing drafted material. Official food safety framework is being redesigned in the aim to improve effectiveness by introducing the process of risk analyses. Coordination and cooperation between the competent authorities involved in food safety issue is becoming more intensive due to the start of negotiation process with EU. Personnel and institutions involved in food safety control are, through pre-accession programs, increasing their knowledge and abilities. Such harmonization of approaches and standards within all the EU member countries is required in order to guarantee same protection to all consumers. The paper discusses challenges and opportunities that Croatia is facing during the EU pre-accession period. (Keywords: food safety, Croatia, EU, risk analysis, strategy)*

### **INTRODUCTION**

Every country needs an effective food safety program in order to protect the health of nation and to participate in international food trade. The goal of such program is to ensure safety and quality of the total food supply, leading to reduction in the incidence of food-borne diseases and improvements in nutritional status and quality of life. Under national food safety programs, national infrastructures and problems can be systematically reviewed and used as a base for development of strategic plan for food safety. The status and delivery mechanisms for food safety programs varies from country to country, reflecting the different stages of development, variations in food safety problems and various administrative arrangements.

Pan-European Conference on Food Safety and Quality (*FAO/WHO*, 2002) held in Budapest set up requests from countries in South East Europe to strengthen food control and legislation. The importance of providing a platform for information exchange and facilitating a regional approach was stressed on the Conference. EU integration process is gathering different cultures, eating habits and perceptions on food safety. It is obvious from the experience, after the last accession of ten new EU countries, that this will not be easy process and certain period will be needed to establish unique criteria for all the food standards in praxis. It is necessary that developed countries assist the EU accessing

countries in establishing modern food safety control system in order to give them opportunity to compete on international market under the same conditions. The following steps are considered as the most important to achieve this goal:

- Drafting national food safety strategy;
- Transposition of EU legislation to national food safety legislation;
- Improvement of the institutional framework;
- Implementation and permanent audit of implemented measures;
- Permanent training in key elements of modern food control system.

Governments in the EU accessing countries are expected to strengthen sub-regional cooperation through enhancement of national food safety authorities making them capable to ensure necessary consumers' protection. Harmony within and between systems in different countries of European region, beside increasing of consumers' protection, should erase unnecessary trade barriers (*WTO*, 1995a, 1995b). The Republic of Croatia commenced trade integration processes by becoming WTO member in the end of the year 2000, and continued this process by concluding free trade agreements with almost all European countries. The Stabilization and Association Agreement enabled Croatia to use duty-free approach to the EU market for nearly all agro-food products. By becoming full EU member country, Croatia will step to the market with around 100 times more consumers than Croatia itself has. This could be seen as a challenge to compete with products that will be recognized on EU market as safe and traditional. In this order, the approach should be changed to the one called "From Farm to Fork" (*EC*, 2004).

## **DISCUSSION**

Croatia's *integration into the EU* is foreseen as the national and foreign policy priority and for that purpose Croatian Government has proactive approach to co-operate and dialogue with EU, as well as in further preparations for the course of negotiations on EU membership. Perceiving EU membership as a matter of national interest seems to be accepted as such by majority of Croatian society. Screening of the EC regulations, particularly 178/2002, 852/2004, 853/2004, 854/2004 and 882/2004 started through interministerial working groups within CARDS 2002 project during the year 2005. The Food Act ("Official Gazette" No. 117/03; 130/03; 48/04), adopted by the Croatian Parliament in July 2003, has established integrated approach to food and feed safety regulation throughout the food supply chain. This created legal framework for the future approximation of the rules to those of the EU. Adoption of this Act should have created improved organization of inspection and control of food. However, screening in the process of EU negotiations has shown that many parts of the Food Law still have to be adjusted to EC regulation 174/2002.

The *EU negotiations* with Croatia were opened in October 2005 and official screening of food safety legislation chapter started in March 2006. Within more than 30 chapters agriculture, rural development, food safety, veterinary protection and consumers' protection are considered as those of the greater importance. The aim of this process would be complete harmonization of the Croatian legislation with the *acquis communautaire*. However, this will be only the base for parallel process of equal importance, which is strengthening the institutional framework that will be implementing adopted regulations in the future. Croatia intends to conclude the negotiations process by the year 2007 and to reach required level of readiness for full membership in the EU and hopefully become full member country in the year 2009. Preparing for membership in the EU is at the same time an instrument of strengthening Croatian food safety system and embarking on wider-scale

globalization processes as well as possible. However, priority will be given to the fact how ready Croatia is going to be for implementing new legislation and proper use of pre-accession foundations. This is considered as more important than the date of accession.

The process of negotiations has improved *coordination between different institutions* in the way of more frequent meetings and discussions about possibilities of improvement of current food safety system. Meetings concerning food safety between Croatian authorities' representatives have much gained in intensity and are usually coming from DG SANCO missions, CARDS projects, adjusting legislation process etc. Coordination of international projects is under the responsibility of the Ministry of Foreign Affairs and European Integrations (MFAEI) within recently established Directorate for Coordination of Assistance Programmes and Cooperation with the EU. Very often such projects require involvement of different institutions that have the same aim. In order to use projects in best way, it is crucial to form interministerial working groups responsible for each part of the project that involves representatives appointed by ministries or institutions.

One of the most useful directions in order to estimate readiness of Croatia to meet EU food safety standards came from *EC – Health & Consumer Protection Directorate-General – Food and Veterinary Office (DG SANCO) mission in Croatia* in the period from 7 to 11 March 2005 (EC, 2005). The Directorate has visited the main food safety authorities in Croatia in order to carry out general assessment of food safety controls and recognize gaps in the system. According to the draft report of the mission, Croatian bodies held general meeting on 12 July 2005 and responded to the Directorate with comments and actions planned or envisaged. The Directorate has estimated Croatian response as acceptable, which proved readiness of all the Croatian authorities to implement EU food safety approach. Beside this report, country profiles on food safety were written (Antunović, 2005; CARDS, 2006a), which gave good base to set up the action plan.

Croatia has already drafted *Food Safety Strategy* (CARDS, 2006b) and is in the phase of discussing it by the representatives of the main institutions involved in food safety. The strategy should revile gaps in the national food control system and facilitate understanding of the needs to change existing food safety system to one that would provide more safety with lower costs. Finishing of national Food Safety Strategy within the CARDS 2002 project (twinning partner Italy) in the year 2006 should give a spin up to all the activities.

In order to follow high food safety standards, it is necessary to strengthen *connection to EU and world organization* and establish the system of active participation in such organizations. Special emphasis, to ensure compatibility and harmonization among the participating countries and with the EU, should be given to the regional approach. Since a great deal of experience in this field is already present in Central Europe, especially in the last group of accession countries, exchange of experience should be mainly sought from those countries. Additional expertise and technical support should be drawn from the EC directly, or European and world organizations such as FAO, WHO, *Codex Alimentarius*, EFSA and different countries' institutions, depending on level of achievement in each of them. *Codex Alimentarius* is considered as one of the priorities to follow up. Codex Contact point for Croatia was established within Croatian Standards Institute in the year 1994. In April 2006, FAO and WHO organized training in Zagreb and promoted material "Enhancing Participation in Codex Activities" (FAO/WHO, 2005) which raised strong willingness of Croatian authorities to establish National *Codex Alimentarius* Committee.

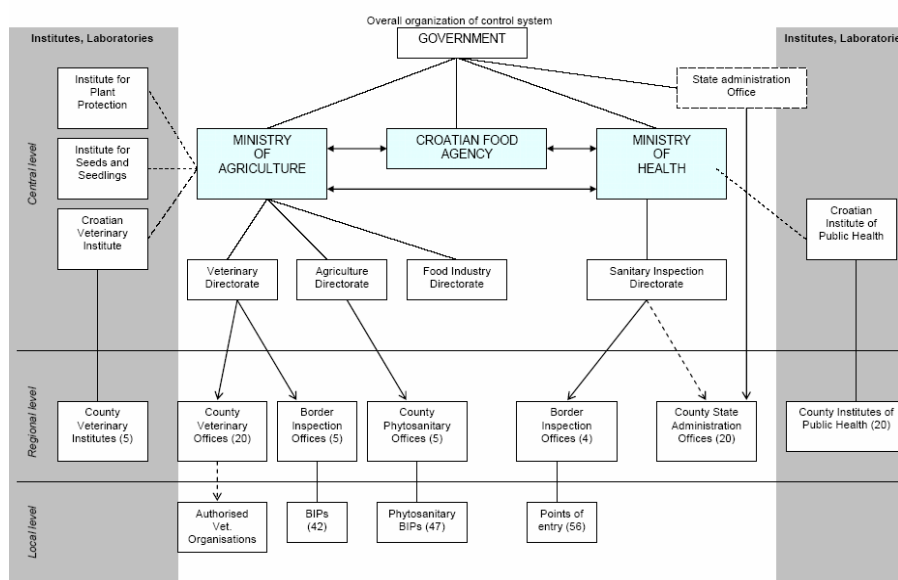
The main *institutions in Croatia* that are establishing internal and external connections are Ministry of Agriculture, Forestry and Water Management (MAFWM),

Ministry of Health and Social Welfare (MHSW), Croatian Food Agency (CFA), as well as other national institutes and laboratories (*Figure 1*).

MAFWM, MHSW and CFA have the overall responsibility for the food chain (plant health, animal health and food safety) in Croatia. The two ministries are preparing necessary rules and regulations related to the area of their responsibilities. In the past there has been some overlapping between their works, but after coming into the force of Food Act (“Official Gazette” No. 117/03; 130/03; 48/04) responsibilities between two ministries were strictly divided. While MAFWM has responsibility for food animal origin, MHSW has responsibility for food of non-animal origin.

**Figure 1**

**Current institutional framework of food safety in Croatia**



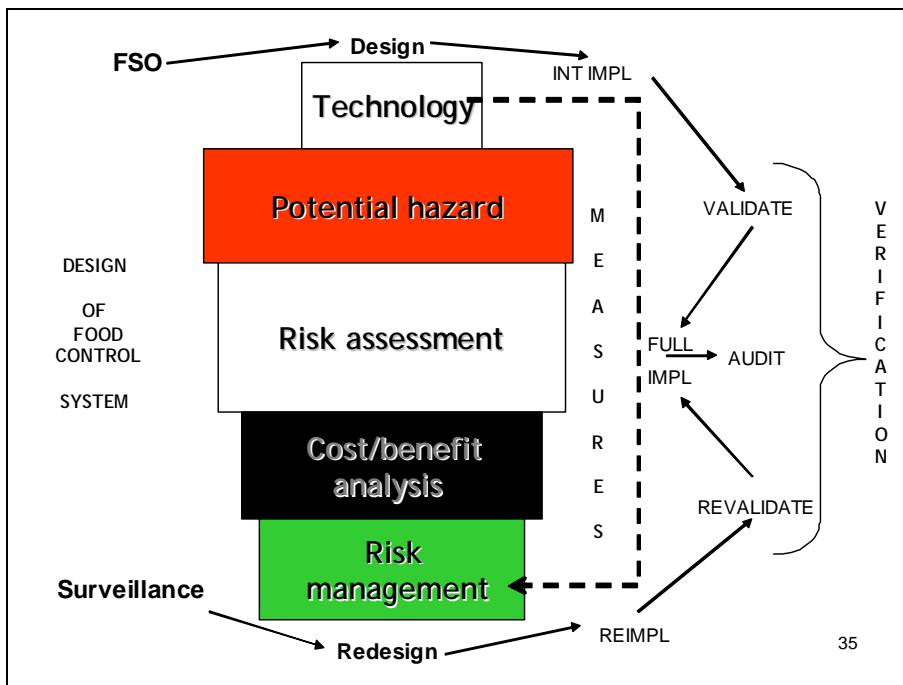
One of the benefits that the Food Act has brought was establishing of the *CFA* as the governmental institution responsible for risk analysis, which started its activity in January 2005 in Osijek and has currently 14 permanent staff, while totally 80 people are involved through the different bodies. All the activities of the *CFA* are discussed by the Advising Committee comprising of representatives from ministries, institutes and universities involved in food safety in Croatia, as well as consumers’ representatives. Scientific committee is coordinating eight scientific panels, each of them dealing with the following issues respectively: food additives; animal feed; plant health & pesticides; GMOs; dietetic products & nutrition; biological, chemical & physical hazards; contaminants; animal health & welfare. The panels are giving scientific opinion on relevant issues, developing brochures in the area of food safety etc. The organization of *CFA* is very similar to the structure of the European Food Safety Authority (EFSA).

Within the duties of risk assessment, *CFA* encourages scientific studies necessary for improving estimation of risks in the area of food and feed safety and establishes unique methodologies for estimation of risks in all phases of production, processing and

distribution of food and feed. As the risk assessment procedure is relatively new even in developed countries, there is strong need of education in this field in order to be able to use it according to WTO agreement, as well as to cover national food safety priorities. In this order, CFA is attending and organizing symposia on risk analysis. Recently, CFA has proposed redesign of food control system in Croatia in the way that is shown on *Figure 2*.

**Figure 2**

**Redesign of food control system in Croatia proposed by CFA**



According to the Food Act (“Official Gazette” No. 117/03; 130/03; 48/04) the role of the CFA is, beside risk analysis process, in the area of coordination among the relevant bodies in the food safety area. Therefore, the plan was to settle a governmental institution responsible for risk assessment, risk communication and co-ordination of risk management along the whole food chain. However, strong need to separate risk assessment from risk management activities, according to *Codex Alimentarius* recommendations (FAO/WHO, 2001), raises new suggestions of revising institutional framework, which is discussed in drafted Food Safety Strategy (CARDS, 2006b).

In order to improve *dealing with crisis* in food safety, CFA in cooperation with the MAFWM and MHSW has formed the Interministerial Group for Drafting Crisis Management Plan - general plan for reacting on possible situations of great public concern and Interministerial Crisis Group formed of five highly responsible persons from main institutions. The plan should determine practical procedures crucial for dealing with crisis, including the organization of crisis unit in the competent authorities, equipping it with staff through the application of the principles of transparency and

determining the communication strategy between CFA, MAFWM, MHSW, other competent state bodies and institutions, consumers and food business operators.

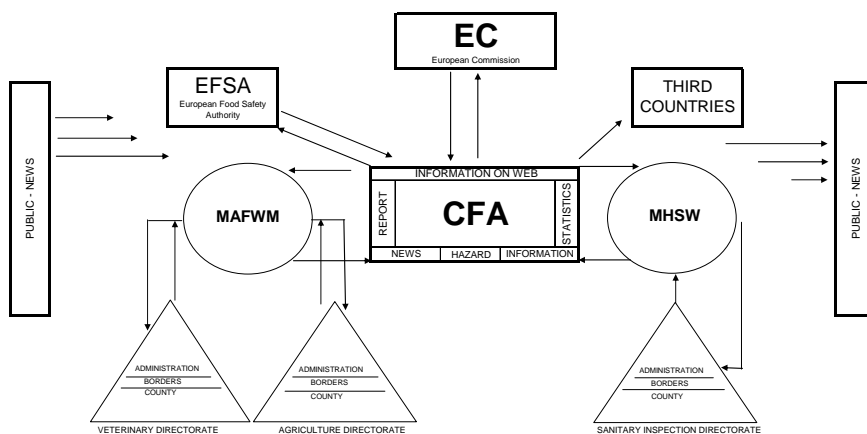
In order to protect consumers' health as fast as possible, CFA has also established emergency phone for coordination among different governmental authorities which is active 24 hours a day. The plan for the next period is to establish video-conferencing room in the CFA office for emergency meetings, especially when scientific advices from scientific panels are needed.

One of the most visible evidence of connecting an accessing country to EU food safety system is certainly *Rapid Alert System for Food and Feed (RASFF)*. The RASFF and its development in the Republic of Croatia has been planned as a part of the CARDS 2002 project «Strengthening the Sanitary Inspection» implemented within the MHSW in partnership with the Finnish counterpart. CFA is national RASFF contact point responsible for receiving and forwarding all the information regarding direct food risk for consumers. In the Republic of Croatia, the first RASFF communications were issued in the week 35 of the year 2003 by the Croatian National Institute of Public Health (CNIPH). In the year 2004, the continuity of communication activity went along, while in the year 2005, the newly established CFA took over the role of the RASFF contact point by taking over and translating communications from the EC on weekly basis, as well as receiving direct communications from the Delegation of the EC in Zagreb and forwarding them to the competent ministries – MAFWM and MHSW. Throughout the year 2005, CFA has received the total number of 23 communications from the Delegation of the EC in Zagreb, out of which 10 communications were related to the food originating from Croatia.

The CFA has started implementing the pilot project for setting up RASFF in Croatia in 2006 (*Figure 3*) with the aim to achieve readiness to connect to EC in year 2008. The project will be moved forward in several stages, whereas the first stage involves setting up of the internal system for Croatia along with delivering general plan for crisis management and guideline for recall or withdrawal of products from the market. In the course of the years 2007 and 2008, an exhaustive IT system covering all competent inspection services (central, border and local) in the area of food and feed is planned to be implemented.

**Figure 3**

**Proposal model for RASFF in Croatia**



The RASFF pilot project comprises following steps:

- a) Description of the framework and timeline for the program completion;
- b) Defining role and capacity of the participating institutions;
- c) Establishing procedures and protocols;
- d) Training and necessary information;
- e) Audit procedure.

As the part of the project, following activities have been implemented up to now:

- Interministerial group for RASFF has been appointed – contact persons (and their deputies) in CFA, MAFWM (Phytosanitary Office, Veterinary Directorate, and Agriculture Directorate) and MHSW (Sanitary Inspection Directorate);
- Contact points of RASFF system have been appointed – veterinary and sanitary inspectors in the MAFWM and MHSW;
- Development of the Treatment Protocol has been in progress – the Treatment Protocol shall include the list of contact persons in order to provide efficient, documented and immediate information to the superintended contact points on each alert.

The Croatian RASFF pilot project is currently involving 12 teams within Agriculture Directorate and Veterinary Directorate of the MAFWM and Sanitary Inspection Directorate of the MHSW. The project, commencing with its work in the first week of 2006, has produced weekly reports and communications, out of which alerts and information were published on official CFA web site ([www.hah.hr](http://www.hah.hr)). Following activities are scheduled to be carried out within the same project framework in the next period:

- Development of communication system - forms and forms attachments are prepared according to those currently used in the EU as the standard RASFF forms (form A contains all data on risks, product, producer, distributor and retail, while form B contains all the data on steps taken to minimize the risk);
- Carrying out the training of staff involved in the process related to: data protocols for communications on risks, information notices and EC notices, ways of presenting information to the public, traceability, recall, administrative and other proceedings;
- System development - development of the strategy for providing information to the public – provision and/or selection of relevant information for the public and industry by the means of web pages, press and direct contacts with industry and consumers' associations;
- Once the operation system is put in place it should be transferred into information technology (IT). This involves investment into IT and implies participation of all the inspection offices operating within various competent bodies, as well as development of the central data base with an Internet/Intranet link for all the authorized users.

The pilot project main goal is RASFF trial implementation in the Republic of Croatia, while expected results include the operational network, detection of possible obstacles and omissions, their removal and obtaining the pilot annual report for the year 2006. In case that setting up of the RASFF system becomes fully operational, in the year 2007 the project would be extended to all the participants and finally it would become part of the EU RASFF network.

Beside RASFF, establishing system of gathering reliable data represents one of the most important steps in order to be able to use data for risk assessment. Development of *Central Information System (CIS)* in the area of food safety in Croatia is a part of the World Bank project/loan «Agriculture Acquis Cohesion Project» implemented within

the MAFWM. Currently, laboratories involved in food safety in Croatia have an obligation for giving annual reports to CFA, which collects all the data necessary for risk assessment. Due to very different reports obtained, Advising Committee of CFA has approved the unique data sheet that is now in usage. The plan for the year 2006 is to set up the architecture of IT system, and thereafter, to issue a call for procuring equipment. Development and setting up of the system for delivering the sector-specific software has been scheduled for the year 2007. Fully developed system, including all the pertaining software and statistical data processing, together with the availability of complementary integration with the identical systems in the EU is timetabled for the year 2008.

Data are currently being collected from the total number of 54 laboratories that perform *food and feed safety analysis* in Croatia. The ministries are approving them for work and accreditation is being done by recently established Croatian Accreditation Agency (CAA). Beside governmental laboratories, there are eight private laboratories in statutory testing network and also ten laboratories within the faculties, which are opened for public services. Seven laboratories are accredited according the HRN EN ISO EC 17025. Accreditation is considered as priority for labs to make them able to provide official control from the moment of EU accession.

Food safety in Croatia is monitored continually in production and trade, as well as when food is imported. The most frequent reasons for declaring food unsafe among the microbiological parameters are increased number of *Salmonella*, *Enterobacteriae*, *Staphylococcus* and sometimes *E. coli*. Among chemical parameters, one of the most frequent reasons is usage of impermissible additives in particular food, as well as increased quantity of additives in certain cases. Presence of toxic metals, pesticides and other contaminants in impermissible amounts is rare cause of finding food being unsafe on the Croatian market.

In order to be able to interpret data, laboratorial results always have to be considered together with *epidemiological data*, as well as with *inspections' data*. Microbiological contamination of food is the most reported cause of consumers' poisoning in Croatia, as well as in the whole world. Due to the changes in lifestyle and dietary habits of people, globalization of food supply, etc., this problem gets bigger all the time and incidences of alimentary infections and intoxications are becoming more frequent. Usually, causes of epidemics are salmonellas and staphylococcus toxin, as well as trichinella among parasites. Over the recent years, the number of reported outbreaks has been within the range of up to one hundred a year (73 on average).

*Human resources* employed in the area of food safety, animal health, animal welfare and plant health in Croatia are estimated to approximately 2.000 professional staff employed. Human resources development plan in the area of food safety should be carried out parallel with harmonization of legislation and should include chain "education of educators" process.

Trainings of various control officials on inspection and sampling in general and on Hazard Analysis and Critical Control Points (*HACCP*) are of the greatest importance in order to fulfill new food safety approach requirements. Giving more responsibilities to producers by implementing HACCP principles requires changes in inspectors' attitude to food control by shifting focuses to establishments' control.

*Consumers' protection*, as natural persons acting on the market for furtherance of their nonprofessional interests, is recognized in Croatia as an area that requires special attention. Providing information to the public on food safety issues and being transparent is one of the priorities of CFA work in order to become trustful source of informations and reliable base for making decisions by risk managers. CFA official website



(www.hah.hr) is daily updated with news, RASFF informations, invitations to seminars, brochures etc. Furthermore, the internet forum, active on this page, is opportunity for consumers to discuss about food safety issues.

Every two years the Parliament adopts the National Consumer Protection Programme, defining priority tasks in the area of consumer protection to be financed from the state budget. Once a year, ahead of the World Consumer Day, the Government reports to the Parliament on the results of the consumer protection policy, as defined in the national programme for preceding year. The Government appoints the Consumer Protection Council, consisting of various representatives, whose activities are considered public.

Consumer protection associations established by consumers are non-profit organizations tasked to promote and protect consumers' rights. The work of consumers' associations includes in particular: consumers' information; product testing at licensed laboratories; comparative product testing; assisting consumers in voicing their grievances before the trader; coming forward with comments and proposals on regulations relevant to consumer protection being in the process of adoption; taking legal actions envisaged by the legislation. From recently, financial support to non-governmental consumer associations is provided by the EC through the project "Capacity Building in the Area of Consumer Protection", which includes IT equipment and technical assistance required for their work. State institutions and public offices involved in food safety inform public about influences on people's health, and according to that they undertake adequate steps, decrease or eliminate risk. CFA, therein, communicates through TV, newspapers, web page, consumers' forum and CID, i.e. free phone.

## CONCLUSIONS

Taking in account everything above mentioned, following steps are considered as the priorities in order to establish new food safety approach in Croatia as an EU accessing country:

### *Food safety policy:*

- revising institutional framework;
- finishing National Strategy on Food Safety;
- developing General Program for Crisis Management in food safety area;
- writing and appliance of with EU adjusted food safety regulations;
- promoting Codex Alimentarius standards and establishing Croatian Codex Committee.

### *Communication:*

- implementing RASFF and active role within it by connecting CFA to DG SANCO;
- connecting all the institutions and approved laboratories that are related to food safety to CFA (building Central Information System).

### *Food control:*

- education and reorganization of inspections on specific issues;
- upgrading network of accredited laboratories according to EU requirements.

### *Risk analyses approach:*

- education on risk analyses process;
- developing coordinative risk management body - decisions being made based on risk assessment results;

- providing risk assessment based on reliable data;
- improving system of gaining data needed for risk assessment;
- developing scientific studies necessary for filling gaps in risk assessments.

*Producers and distributors:*

- introducing HACCP system in producing and distributing units;
- developing guidelines for GMP and HACCP and application of those systems;
- education of inspections on HACCP system;
- improving traceability through introducing system „one step back – one step forward“;

*Consumers:*

- building – up consumers’ confidence – developing Public Communication Strategy – improving transparency;
- promoting healthy nutrition.

*Cooperation:*

- connecting with the EC and EFSA;
- connecting to similar institutions in Europe and World (regional and global cooperation);
- cooperation with FAO/WHO and other European and World associations.

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