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Food Safety Improvement and Labelling of Traditional Meat Processed Products in Serbia: EU Experience of Slovak Republic

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Table of Contents

EXECUTIVE SUMMARY.....	3
1. Introduction.....	4
2. Problem description	5
2.1. TMPP food safety	5
2.2. TMPP labelling	6
3. Policy options.....	7
3.1. Options for TMPP food safety improvement	7
3.2. Options for improvement of TMPP labelling.....	8
4. Conclusions and Recommendations.....	9
Bibliography	11

EXECUTIVE SUMMARY

The aim of this paper is to improve traditional meat processed products (TMPP) food safety and labelling. The core aim of this paper is to investigate and use the Slovak Republic's experience to find solutions which could then be applied in Serbia. The main effect of the proposed solutions will be to bring better food safety to consumers, better recognition of traditional products and protection for TMPP producers. The main focus of this paper is on farms, micro and small enterprises as important producers of TMPPs which are obliged to apply good hygienic practices (GHP) in production instead of the HACCP system.

TMPPs form a very important part of a regular Serbian diet. Traditionally, these products are bought at open markets, butchers' shops and directly from producers. The food safety of these products is a large problem at the moment, because government institutions cannot control all products which come onto the market. It has also been observed that hygienic conditions on farms which produce TMPPs are not satisfactory. Factors additionally complicating the situation in Serbia are: no definition of the level of production at which the HACCP system becomes obligatory, lack of education and training for producers related to application of GHP, and a vacuum between veterinary control on farms and sanitary controls on the market.

Apart from the above-mentioned food safety problems with TMPPs it should also be noted that traditional products in Serbia are not marked with special labels as in the EU. The main purpose of labelling traditional products is to emphasize their special characteristics to the consumer. The lack of a label for traditional products in Serbia leads to the misuse of the term traditional product and the misleading of customers. At state level there are no laws or regulations which define criteria for registration of products as traditional.

The research conducted in Slovakia consists of desk research, observation of the situation on farms and semi structured interviews with Slovak experts. Based on the research findings and principles expressed in domestic and EU laws, we propose solutions which could help improve food safety and TMPP labelling in Serbia. The proposed solutions relate to matters such as: level of production above which HACCP is obligatory, organization of education and training for farmers related to GHP, improvement of veterinary controls at farm level, criteria for registration of traditional products, cost reduction of the registration procedure and plans for a campaign to promote labelling for traditional products.

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Food Safety Improvement and Labelling of Traditional Meat Processed Products in Serbia: EU Experience of Slovak Republic

1. Introduction

The Republic of Serbia has declared joining the EU, which now consists of 27 member countries, as one of its goals. Harmonization of domestic legislation with EU laws represents an important precondition for joining the EU. Food safety and protection of consumers' health is a major priority for the EU and a necessity for countries which intend to join the EU (EC, 2000). Modern consumption trends in Europe show that consumer interest in traditional food is rising because of its special characteristics (Patermann, 2007; FAO, 2008). The importance of traditional products for a country and consumers can be summed up in four ways: an economic dimension, health dimension, nutritional dimension and cultural heritage (FAO, 2008).

The economic dimension of traditional meat processed products (TMPPs) from farms, micro and small enterprises is reflected in their role as a source of income for those subjects. When producing TMPPs, farmers produce products with added value, i.e. products which can be sold at higher market prices. Also, the majority of TMPP production is in rural areas of Serbia which are less developed and where agriculture is the main source of income. The production of TMPPs improves the economic situation in these areas.

The health dimension of TMPPs is reflected in their positive influence on consumer health as they do not contain artificial aromas and preservatives as is the case in most processed food products. But they can harm consumers' health if food hygiene is not satisfactory.

In our country there is a long tradition of TMPP consumption (e.g. bacon, dried ham, dried sausages) and they form an important part of the everyday diet. Traditionally, these products are often bought at open markets, in small specialized shops, butchers' shops and directly at farms.

The biggest current problem is TMPP food safety because government institutions are unable to check all products on the market and production hygiene at farm level is insufficient. The consequence is a higher risk of consumers contracting food born diseases such as e-coli, trihineloses, salmonella, BSE and blue tongue. TMPP food safety is a basic precondition for placing those products on the market and a basic quality factor in consumers' minds and without which consumers will not make a purchase. Apart from the above-mentioned problem with TMPP food safety, there is no special label for marking traditional products. In this situation all producers can claim that their product is traditional, which is a misuse of the term traditional. The lack of a label for traditional products denies consumers important information about the specific character of a product at the point of purchase.

The goal of this paper is to improve food safety and labelling of TMPPs from farms, micro and small enterprises toward EU standards by using the experiences of the Slovak Republic. Slovakia's experiences are important for Serbia because both countries have similar TMPPs,

with the difference that Slovakia, as an EU member, applies higher standards. Slovakia also has experience in registering four traditional products at EU level.

To investigate Slovak experiences in food safety and TMPP labelling, the following research methods are used: desk research, semi structured interview and observation. While these methods helped us gain information it should be mentioned that they have limitations, such as: the small number of experts and farms examined, subjectivity of respondents, and insufficient literature. However, to overcome these limitations we paid special attention to the selection of domestic and Slovak experts who participated in research.

This paper consists of two parts: description of problems and policy options. In the first part we describe problems we have indentified in Serbia, while in the second we give our ideas for their solution based on research results.

We would like to emphasize that this paper does not pretend to solve all food safety and labelling problems in Serbia. All we want is to present a different approach to solving problems by using Slovakia's experience. We hope that law makers in Serbia will take this paper into consideration when drafting new regulations.

2. Problem description

2.1. TMPP food safety

Major food scandals across the world in recent years have led to increased consumer interest in information related to food safety. Every year in Serbia there is a small epidemic of food poisoning caused by farm-made sausages or other meat products, mostly as a consequence of bad food production hygiene. These epidemics influence consumer trust in products from farms, micro and small enterprises which are sold directly to consumers or through open markets. When this happens consumers abandon open markets as a place for purchasing TMPPs, which leads to a decrease in farmers' income. To ensure consumer trust is not lost, TMPP food safety has to improve.

Food safety regulations in Serbia are framed within two laws: The Food safety law (2009) and the Veterinary law (2005), which are consistent with EU laws in this area. The Food safety law (2009) dictates that all subjects dealing with food must apply the HACCP system to minimize food-borne diseases. This provides a good precondition for high consumer protection. Also, subjects producing food in small amounts do not have to apply HACCP, but instead must apply good hygienic practices (GHP) and good production practices (GPP). A current problem is an unfamiliar production volume below which HACCP is not obligatory for producers, and where GHP and GPP become applicable. This is very important because it affects the survival of a large number of small producers who do not have the finances to introduce and apply the HACCP system. It is also very important for consumer safety, because it directly influences farm products' food safety risks.

Another problem is a low level of awareness among producers of the meaning of GHP and GPP which they should apply in production processes. It should be noted that farmers have low awareness and knowledge levels of food safety. According to Professor Radovanovic, food hygiene on farms is more a matter of farmers' subjective opinion and personal values than of real knowledge of measures which provide sufficient food hygiene (R. Radovanovic,

personal interview, Jun, 2010)¹. Therefore, ways must be found to educate producers about GHP and GPP meanings to improve farm products' food safety.

A third current problem is control of products which come directly from farms and are sold directly or through open markets. Until the introduction of the Food safety law (2009), there was a gap between veterinary control on farms and sanitary control on the market – in reality nobody was controlling food processing on farms. As well as this there was no central register for food producers, so it was impossible to control all food producers, especially smaller ones, because there was no information about their existence. They can now be controlled, but this also raises questions over the cost of controls. A balance between control costs and food safety must be found. Very often controls bring higher costs, but also a lower level of food risk.

2.2. TMPP labelling

As previously stated, food safety is the main precondition for product purchase and a basic factor of product quality. However, consumers also take into account other product characteristics which make a product distinctive, i.e. specific quality of the product (FAO, 2008). TMPPs are products with diverse production methods, dietary significance, impact on consumers' health and cultural heritage. Consumers must be provided with this information if their willingness to purchase TMPPs is to be influenced. At EU level there is a label for traditional products (TSG-Traditional Specialty Guaranteed) which tells consumers that products have been made with traditional methods used for more than 25 years (EC, 2007).

In Serbia there is no label at national level which denotes traditional products. The lack of such a label allows for production of false traditional goods, i.e. products which are not made in a traditional way but are presented as traditional to consumers. The main damage is to consumers who are misled into paying for a product they do not get, and the producers of real traditional products whose production processes are time consuming. Many consumers irritated with the situation turn to big companies' products and many producers abandon production of traditional products.

It is therefore necessary to introduce regulations which will stop the further decay of the image of traditional products. The only law in the area of food product labelling which applies EU standards in Serbia is the Law on Indications of Geographic Origin (2010) although this does not include traditional products. However, legislation itself is not enough for the success of labelling of traditional products. It is also important to focus on criteria for registering a product as traditional, simplicity of the registration procedure, post-registration costs and a promotional campaign for the label.

In the next part of the paper we present our solutions, based on research findings, for the problems presented above.

¹ Dr. Radomir Radovanovic is a professor at the department for food safety and food quality management at the Faculty of Agriculture in Belgrade.

3. Policy options

The policy options presented here are in line with principles contained in the Food Safety Law (2009) and EU directives. They are also derived from the opinions and experiences of Slovak and domestic experts who participated in the research.

3.1. Options for TMPP food safety improvement

Determination of TMPP production volume at which the HACCP system does not have to be applied is a complex question. In Serbia, there are a huge number of producers who produce TMPPs in small quantities but who do not have the finances necessary to introduce HACCP. Before joining the EU, the Slovak government introduced legislation under which producers without HACCP could not sell TMPPs. This led to many producers abandoning production of TMPPs while the import of similar products from other countries increased (Popelka et al, 2005; Z. Birosova², personal interview, June, 2010). On the other hand, Slovenia applied a different approach where it was decided that the HACCP system did not have to be applied when meat production was below 52 LSU/year³ of ungulates, but that at that level GHP and GPP must be applied instead. This solution preserved TMPP production at farm level and food safety requirements were met. We think that a similar solution should be applied in Serbia, but in consultation with experts and relevant producers' associations. The application of this solution would preserve TMPP production at farm level while EU food safety standards would be met.

There is also a question of application of food safety standards at farms, micro and small enterprises, as very high standards require a lot of money while standards that are too low harm consumers' health. At national level in Slovenia and Slovakia derogated EU regulations 852/2004 and 853/2004 (M. Matus⁴, personal interview, June, 2010; G. Salobir-Vilar⁵, personal interview, June, 2010) are applied for small producers. In this way they meet EU food safety standards and allow small producers to sell their products on the local market. The annexes of regulations 852/2004 and 853/2004 contain requirements for food safety which are in line with Codex alimentarius and general principles of GHP (FAO and WTO, 2009), so the same solution could be applied in Serbia. Applying these requirements would provide a good level of food safety and consistency with EU laws.

The key to successful GHP application at farm level is education of producers. The best way to achieve this is the organization of seminars and training for veterinarians who work with farmers and members of producers' associations. After this phase, trained people would spread knowledge to farmers (M. Matus, personal interview, June, 2010; G. Salobir-Vilar, personal interview, June, 2010). In line with training, written materials about activities of GHP (e.g. manuals) should be produced and given to farmers. It should be noted that these materials have to be written in a simple manner, with a lot of pictures and not too many pages (Z. Birosova, personal interview, June, 2010). This solution can be easily applied in Serbia because there is an already established network of government institutions with sufficient human resources.

² Zuzana Birosova is a director of the department for food quality and nutrition at the Slovak Ministry of Agriculture, Environment and Rural Development.

³ LSU (livestock unit) is a standard measurement which allows aggregation of various categories of livestock for comparison. One LSU is equivalent to the weight of one cow (500kg).

⁴ Milan Matus is head of the Chief Veterinary Officer's department at the Slovak State Veterinary and Food Administration.

⁵ Gabriela Salobir-Vilar is an expert for the advisory service at Agricultural Chamber of Slovenia

The costs of food safety control are important because they influence production costs and consumer safety. It is very important for both producers and the government that veterinary control is cheap and that food is safe. A basic element of TMPP food safety is slaughtering animals in slaughterhouses where animal carcasses can be examined. However, this solution is expensive for small producers. An alternative can be found in small slaughterhouses where animals are slaughtered immediately and carcasses are transported back to farms. This solution is applied in Slovenia, and is very successful because it offers low slaughter costs and good food hygiene (G. Salobir-Vilar, personal interview, June, 2010). The veterinary control of TMPPs is much easier and cheaper with this solution.

In line with the above mentioned solution, a gradual control system should be accepted to decrease costs of controls. The gradual control system means that at the beginning of TMPP production control numbers are high (e.g. twice a month). But if control results are good the number of controls drops (i.e. once in three months). On the other hand, if control results are bad control numbers rise until the problem is solved or production is stopped. The gradual control system works well in Slovenia and provides a high level of food safety. Also, consistent with the principle of traceability and to decrease control costs it is necessary to introduce:

1. Evidence of used inputs in production process (type of inputs, date of acquisition, amount of acquisition, and name of seller);
2. Evidence of meat in production (date of slaughtering, type of meat, amount of meat and amount of products for personal use);
3. Animals which are bought for meat production must stay at least three months on a farm before slaughtering.

The proposed solutions for TMPP food safety improvement are aimed at decreasing control costs and increasing the efficiency of controls. The main advantages of the proposed solutions are: applicability, low introduction costs and the availability of human resources able to apply them.

3.2. Options for improvement of TMPP labelling

Slovak experience shows that the crucial factors for success of TMPP labelling are: duration of registration procedure, simplicity of the procedure, costs of laboratory analysis, and promotional campaign for the label (M. Pisova⁶, personal interview, June, 2010). These factors influence the readiness of producers to register products as traditional and consumers' acceptance of the label.

In order to overcome these problems the Slovak Ministry of Agriculture has decided that all activities related to the registration procedure within the jurisdiction of the ministry are cost-free and the registration procedure must be completed within three months. However, producers have to pay for laboratory analyses and studies proving their product is traditional. Our opinion is that the same solutions have to be applied in Serbia because

⁶ Michaela Pisova is coordinator for EU at the Food Safety and Nutrition Department at the Slovak Ministry of Agriculture.

there is no direct payment to producers (i.e. saves government money) while reducing registration costs should motivate producers to register products.

The criteria for registration of a product as traditional play an important role because they determine the simplicity of the registration procedure. We propose that criteria for registration be the same as those in the EU as this will bring national standards into line with those of the EU and consumers will get comparable products. Also, the registration of traditional products from Serbia at EU level would be easier and faster when Serbia joins the EU.

Possibly the most crucial factor in the success of a label marking traditional products is a promotional campaign for the label. Without a promotional campaign consumers do not have information about the label and what it represents, so they do not use it in a purchase situation (D. Sufakova⁷, personal interview, June, 2010). Slovakia's experiences show that promotion of the label via all available channels (TV, radio, internet, magazines, billboards and brochures) is necessary for its success. It is also necessary to motivate producers to register their products as traditional by offering them free promotion at all government-organized events (e.g. fairs and exhibitions). The campaign does not have to be expensive, but must be extensive enough to be remembered. Slovak experience shows that such a campaign should run for at least two years, after which positive results can be expected. We think that a promotional campaign for TMPPs is necessary as without it consumers will not recognize the label and registration will be meaningless.

4. Conclusions and Recommendations

Food safety is major precondition for placing TMPPs on the market and consumer purchase. Along with TMPP food safety, other special characteristics of these products which make them attractive to consumers are also important. In Serbia we face problems of low TMPP production hygiene levels at farm level, and lack of a label indicating their traditional nature. Based on findings of research into Slovak experiences in food safety and labelling, and following principles stated in Serbian and EU regulation, we propose the following solutions:

1. Production of 52 LSU/year of ungulates for TMPPs production should be the lower level of HACCP system application. GHP and GPP should be applied below this.
2. GHP must be applied at farm level according to EU regulations 852/2004, 853/2004.
3. Training must be provided and manuals created for producers for successful application of GHP at farm level.
4. Animal slaughtering should be carried out in small slaughterhouses
5. A gradual system for control of GHP applications must be introduced.
6. Additional evidence for inputs and meat used in TMPP production must be introduced.

⁷ Dusana Sufakova is a clerk at the Food Industry Department at the Slovak Ministry of Agriculture.

7. Costs related to registration of traditional products must be decreased by providing free services within the jurisdiction of the ministry of agriculture.
8. Criteria for TMPP registration as a traditional product should be the same as in the EU.
9. A campaign promoting a traditional product label must be started.

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