



United States Department of Agriculture

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

Dr. Matausic-Pisl
Chief Veterinary Officer
Planinska ulica 2a, 10000 Zagreb
Croatia

FEB 23 2015

Dear Dr. Matausic-Pisl,

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Croatia's meat inspection system from July 30 through August 8, 2014. Enclosed is a copy of the final audit report. The comments received from the government of Croatia are included as an attachment to the report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 720-8609, by facsimile at (202) 720-0676, or electronic mail at international.audit@fsis.usda.gov

Sincerely,

Dr. Shaukat H. Syed
Director
International Audit Staff
Office of Investigation, Enforcement, and Audit

Enclosure

**CROATIA
FINAL AUDIT REPORT**

February 11, 2015
Food Safety and Inspection Service
United States Department of Agriculture

Executive Summary

This report describes the outcome of an on-site equivalence verification audit conducted by the Food Safety and Inspection Service (FSIS) from July 30 to August 8, 2014, to determine whether Croatia's food safety inspection system governing the production of meat remains equivalent to that of the United States with the ability to produce products that are safe, wholesome, unadulterated, and properly labeled. Croatia is eligible to export thermally processed commercially sterile pork products to the United States. The audit was designed to verify equivalence of Croatia's meat inspection system and focused on six main system equivalence components: (1) Government Oversight, (2) Statutory Authority and Food-Safety Regulations (SAFSR), (3) Sanitation, (4) Hazard Analysis and Critical Control Points (HACCP) Systems, (5) Chemical Residues Control Programs, and (6) Microbiological Testing Programs. Prior to the on-site audit, the FSIS auditor reviewed information provided by the Central Competent Authority (CCA) in FSIS' self-reporting tool (SRT), reports of corrective actions instituted by the CCA to address 2009 FSIS audit findings, and CCA reports of corrective actions implemented to address the point of entry (POE) violations reported by FSIS.

The FSIS auditor reviewed the functions at the CCA headquarters, three certified establishments (one slaughter and two processing), and one government laboratory to assess whether the national system of inspection, verification, and enforcement is being implemented as reported in the SRT and as required to maintain equivalence.

The audit findings are summarized below and further addressed in the respective sections of the report.

System Component		Audit Findings
1	<i>Government Oversight</i>	The audit findings in Government Oversight and Sanitation components indicate a need to improve the CCA's oversight functions.
2	<i>SAFSR</i>	No concerns identified.
3	<i>Sanitation</i>	Sanitation Performance Standards (SPS) findings in two establishments.
4	<i>HACCP</i>	No concerns identified.
5	<i>Chemical Residues Control Programs</i>	No concerns identified.
6	<i>Microbiological Testing Program</i>	No concerns identified.

The audit results indicate that the CCA's food safety inspection system is operating at an "adequate" level. The CCA meets most of the core criteria for equivalence components. During the exit meeting on August 8, 2014, the CCA noted that it has already begun to address the audit findings by implementing immediate corrective actions. FSIS will evaluate any information provided by the CCA including any records or other information that Croatia submits in response to this draft audit report to assess whether the CCA has effectively implemented the corrective actions, and whether they are effectively addressing FSIS's concerns.

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	AUDIT GOAL AND OBJECTIVES	1
III.	AUDIT METHODOLOGY	2
IV.	COMPONENT ONE: GOVERNMENT OVERSIGHT.....	3
V.	COMPONENT TWO: STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS.....	5
VI.	COMPONENT THREE: SANITATION	7
VII.	COMPONENT FOUR: HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEMS.....	8
VIII.	COMPONENT FIVE: CHEMICAL RESIDUES CONTROL PROGRAM.....	9
IX.	COMPONENT SIX: MICROBIOLOGICAL TESTING PROGRAMS.....	10
X.	CONCLUSIONS AND NEXT STEPS.....	12
	APPENDICES	13
	APPENDIX A: Individual Foreign Establishment Audit Checklist.....	14
	APPENDIX B: Croatia’s Response to Draft Final Audit Report (when available)	15

I. INTRODUCTION

The Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA) conducted an on-site equivalence verification audit of Croatia's meat inspection system from July 30 to August 8, 2014.

Animal and Plant Health Inspection Service (APHIS) has not declared Croatia to be free of Foot and Mouth Disease, Rinderpest, Classical Swine Fever, and Swine Vesicular Disease. As a result, Croatia is only eligible to export thermally processed commercially sterile (03D) pork products to the United States. Between October 1, 2012, and June 20, 2014, Croatia exported approximately 515,630 pounds of processed products to the United States. A total of 40 pounds was rejected at Point of Entry (POE) due to miscellaneous labeling issues.

This audit was conducted pursuant to the specific provisions of the United States laws (U.S. Code, U.S.C.) and regulations (Code of Federal Regulations, CFR), in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.)
- The Humane Methods of Livestock Slaughter Act (7 U.S.C. 1901-1906)
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end)

The audit standards included all applicable legislation and procedures originally determined equivalent by FSIS as part of the initial equivalence process, and any subsequent equivalence determinations that have been made under provisions of the Sanitary/Phytosanitary Agreement. The equivalent laws and regulations reviewed included European Commission (EC) Regulation No 852; 853; 854; 882; 178; 20723; and Council Directive 96-22 and 96-23. The Central Competent Authority (CCA) has adopted and implemented requirements consistent with FSIS requirements pertaining to meat inspection cited in 9 CFR in certified establishments intending to export to the United States. The only exception in which FSIS granted equivalency for the CCA is that the *Salmonella* samples are collected by the establishment employees and analyzed in private laboratories. However, the government oversees this sampling and the laboratory analysis.

II. AUDIT GOAL AND OBJECTIVES

FSIS' overall goal for the audit was to verify that Croatia's food safety inspection system governing meat products continues to be equivalent to that of the United States, with the ability to produce and export products that are safe, unadulterated, wholesome, and properly labeled. To achieve this goal, the audit focused on six equivalence components to determine whether each component continues to be equivalent to that of the United States: (1) Government Oversight, (2) Statutory Authority and Food-Safety Regulations, (3) Sanitation, (4) Hazard Analysis and Critical Control Points (HACCP) Systems, (5) Chemical Residues Control Programs, and (6) Microbiological Testing Programs. The FSIS auditor verified that the CCA implemented its proffered corrective actions in response to the September 2009 FSIS audit.

III. AUDIT METHODOLOGY

FSIS utilized its established four-phase process to conduct this equivalence verification audit: plan, execution (on-site), evaluation, and feedback. Each phase is described below.

The first phase is a document review and analysis of previous audit findings and other available information. Therefore, prior to conducting the 2014 on-site audit, FSIS examined the CCA's performance within the six equivalence components, data on exported product types and volumes, POE testing results, and other data collected since the FSIS audit in 2009. In addition, the FSIS auditor reviewed information obtained directly from the CCA, through a Self-Reporting Tool (SRT). This comprehensive analysis served as the basis for planning the on-site audit itinerary.

The second phase is the on-site audit or execution phase. FSIS conducted this on-site audit to verify the CCA's oversight activities as they relate to each equivalence component. The auditor gathered data on all six components through document reviews, interviews, observations, and site visits. The FSIS auditor was accompanied throughout the audit by representatives from the CCA.

Management, supervision, and administrative functions were reviewed at the CCA headquarters, one porcine slaughter and processing establishment, two processing (canning operation) establishments, and one government laboratory to verify that the national system of inspection, verification, and enforcement was being implemented as required to maintain equivalence.

During the establishment visits, the auditor paid particular attention to the extent to which the government and industry interact to control hazards and prevent program deficiencies that may threaten food safety, with an emphasis on the CCA's ability to provide oversight through supervisory reviews conducted in accordance with 9 CFR Part 327.2.

FSIS visited the CCA central reference laboratory, a government laboratory located at Zagreb, which conducts analytical testing as part of Croatia's national residue program as well as microbiological testing of official samples. During this laboratory review, the FSIS auditor interviewed the inspection personnel to assess the CCA's oversight activities for implementation of approved chemical residue and microbiological testing programs and reviewed the CCA's annual laboratory audit reports.

The third phase of the audit is evaluation. FSIS conducted an evaluation of all data collected during the on-site audit through direct observations, record review, and interviews to determine whether the CCA's performance is consistent with the information provided to FSIS in the SRT and other submitted documents. FSIS conducted an exit meeting with the CCA representatives to convey all audit findings and discuss next steps.

The final phase of the audit is feedback, which begins with this draft audit report providing the CCA with an opportunity for comment. After reviewing the CCA's comments and responses to all findings, FSIS prepares a final report. The CCA develops an action plan to address any issues raised by the audit, and FSIS monitors resolution of all issues.

IV. COMPONENT ONE: GOVERNMENT OVERSIGHT

The first of the six equivalence components reviewed was Government Oversight. FSIS' import eligibility requirements state that an equivalent foreign inspection system must be designed and administered by the national government of the foreign country with standards equivalent to those of the United States' meat inspection system.

The evaluation of this component included a review of documentation submitted by the CCA as support for the responses and corrective actions, as well as on-site record reviews, interviews, and observations made by the FSIS auditor at government offices and in the audited establishments.

The FSIS auditor verified that the Ministry of Agriculture (MA) has the overall responsibility for policy, legislation, and implementation of official controls in relation to food safety. In accordance with the current internal organization of MA, the CCA is the Veterinary and Food Safety Directorate (VFSD). The VFSD has the responsibility for carrying out Croatia's inspection program, including oversight and enforcement of the CCA's regulatory requirements in meat producing establishments certified by the CCA as eligible to export to the United States and in the residue and microbiology laboratories in which United States -certified product is analyzed. The CCA has four organizational sectors:

- Administrative, European and Financial Affairs Sector (SAEFA)
- Animal Health Protection Sector (AHPS)
- Veterinary Public Health and Food Safety Sector (VPHFSS)
- Veterinary Inspection Sector (VIS)

The SAEFA responsibilities include monitoring the harmonization of Croatian legislation with the EU requirements in the veterinary and food safety field. SAEFA is responsible for coordinating and managing EU legislation in the veterinary and food safety field.

The AHPS responsibilities include developing policies and managing activities related to animal health surveillance and monitoring; control and eradication of animal diseases; contingency planning and crisis management; animal welfare; financing of measures on early detection and eradication of animal diseases; and activities related to identification of animals and registration of their movements.

The VPHFSS responsibilities include drafting legislation on hygiene requirements for food of animal origin, procedures on implementing legislation for food of animal origin, and keeping and updating registration of establishments dealing with food of animal origin.

The VIS is responsible for implementing and enforcing official controls on food safety issues and drafting the annual official control plan. The VIS consists of 13 Regional Veterinary Inspection Departments (RVID) and 65 branch offices throughout the country. Heads of RVID supervise the regional senior veterinary inspectors (SVIs). The regional SVIs supervise and verify the performance of in-plant authorized veterinarians (AVs). The MA authorizes the implementation of specific food safety tasks to authorized veterinary organizations on a contract basis for a period of 5 years.

The *Veterinary Act* (OG 82/13, 148/13) lays down the specific conditions for the delegation of specific tasks to a control body. The AVs specific inspection tasks include ante-mortem and post-mortem inspection at slaughter establishments, including the authority to condemn carcasses and parts;

verification of the humane handling and slaughter; and verification of establishment's sanitation, HACCP, and GMP programs at slaughter and processing establishments. The SVIs are responsible for enforcing regulatory requirements.

The *Veterinary Act* defines the tasks and responsibilities of SVIs (articles 137-152) and AVs (articles 153-154). The frequency of official verification controls in each establishment is based on a risk assessment calculation as being "high," "medium," or "low." The risk assessment results are used to create the National Control Plan, which provides details on official verification control activities to be carried out by SVIs and AVs (checklists, instructions, type of controls, responsibilities, and time dedicated to each control, control methods, and appropriate techniques).

The CCA has decided that all United States-certified establishments are placed under a high-risk category frequency, which requires SVIs and AVs to conduct daily official verification controls in accordance with FSIS regulatory requirements in 9 CFR. During the on-site audit of three United States-certified establishments, the FSIS auditor verified through interviewing inspection personnel and reviewing inspection-generated records that the daily implementation of official verification control is being conducted properly for pre-operational and operational procedures, HACCP, and sanitation controls.

The *Food Act* (OG 81/13 and 14/14), *Veterinary Act*, and *Act on Food Hygiene and Microbiological Criteria for Food* (OG 81/13) provide the legal basis for the CCA to access the food establishment premises and records. The FSIS auditor verified through document reviews and interviews that the CCA maintains daily inspection in the establishments certified to export to the United States. The FSIS auditor also verified through document review that, in accordance with Article 132 of the *Veterinary Act*, all fees for official controls including the costs of inspection monitoring and verification activities, veterinary certification, and veterinary supervision are paid from the state budget.

The CCA's regulatory oversight of its meat inspection system control consists of four levels: central, regional, branch, and establishment. At the establishment level, the AVs enter the results of the daily inspection verification into a *VETI* (Veterinary Inspection) application. At the branch level, the SVIs have direct supervision over the AVs inspection activities. The SVIs are responsible for reviewing the contents of *VETI* with a minimum frequency of one review per month, conducting performance appraisal of the AVs with a minimum frequency of two reviews per year, and completing the contents of "*e inspector*" application requirements with a minimum frequency of two applications per year for all United States-certified establishments. In addition, SVIs are responsible for conducting periodic supervisory reviews in United States-certified establishments. At the regional level, the regional inspection personnel review the function and performance of branch SVIs on an annual basis. At the central level, a senior veterinarian at the CCA's headquarters has access to all inspection data including the contents of *VETI* and *e inspector* applications.

Since 2009, the CCA has provided ongoing training programs in cooperation with TAIEX to its inspection personnel. TAIEX is the technical assistance and information exchange instrument managed by the Directorate-General Enlargement of the European Commission. TAIEX supports member countries with regard to the application and enforcement of EU legislations. Some of TAIEX's main duties are:

- To provide short-term technical assistance and advice on the transposition of EU legislation into the national legislation of beneficiary countries and on the subsequent administration, implementation and enforcement of such legislation;
- To provide technical training and peer assistance to partners and stakeholders of the beneficiary countries; and
- To provide database tools for facilitating and monitoring progress as well as to identify further technical assistance needs.

The FSIS auditor interviewed a number of the inspection personnel to assess their knowledge, skills, and abilities and reviewed their training records. In addition, the FSIS auditor observed in-plant inspection personnel and laboratory personnel while they were conducting their inspection activities. The FSIS auditor verified that both in-plant inspection and laboratory personnel have attended the ongoing training and have sufficient training in performing their inspection activities.

During the on-site audit of three United States - certified establishments, the FSIS auditor identified sanitation problems in more than one plant. These findings indicate a need for the CCA to improve its oversight of inspection with respect to sanitation.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an “adequate” level of performance for this component.

V. COMPONENT TWO: STATUTORY AUTHORITY AND FOOD SAFETY REGULATIONS

The second of the six equivalence components that the FSIS auditor reviewed was Statutory Authority and Food Safety Regulations. The inspection system must provide an appropriate regulatory framework to demonstrate equivalence with FSIS’ requirements, including but not limited to HACCP, sanitation, chemical residue and microbiological sampling, humane handling and slaughter, ante-mortem inspection, post-mortem inspection, establishment construction, facilities, equipment, daily inspection, and periodic supervisory reviews to the establishments certified to export to the United States.

The evaluation of this component included an analysis of information provided by the CCA through the SRT, interviews, and observations during the on-site portion of the audit. The FSIS auditor visited the CCA headquarters in Zagreb to assess the CCA’s ability to effectively communicate the inspection requirements to the inspection personnel. The implementation of these requirements was assessed at three United States-certified establishments.

The FSIS auditor verified that the EC legislation serves as overarching regulations and is supplemented by Croatian legislation that consist of several national laws including:

- The *Food Act* which is the basic framework law in Croatia on food safety. It lays down provisions at the national level with respect to the responsibility of food-producing establishments in implementing food safety controls;

- The *Veterinary Act* which addresses protection of animal health, veterinary public health, improvement of animal production and veterinary protection of environment, official controls and inspection in the veterinary field. The *Veterinary Act* ensures implementation of Regulations (EC) No 853/2004, 854/2004, 2074/2005 and 2075/2005, and Regulations (EC) No 178/2002, 852/2004 and 882/2004 associated with food of animal origin;
- The *Act on Food Hygiene and Microbiological Criteria for Food* which specifies the competences and duties of the CCA, the obligations of the food producing establishments, official controls and stipulates the administrative measures for the implementation of Regulations (EC) No 852/2004, 2073/2005, 210/2013 and 37/2005; and
- The *Act on Official Controls Performed in Accordance with the Requirements of Food and Feed Law, Animal Health and Animal Welfare Rules* (OG 81/13, 14/14) which specifies the CCA's authorities and its tasks related to the organization, coordination, and implementation of official controls and establishes a system of cooperation, communication, and reporting for official and reference laboratories and penalty provisions for enforcement of Regulation (EC) No. 882/2004 and other related Regulations.

The *Veterinary Act* requires that only veterinarians conduct ante-mortem inspection. During the on-site audit of a porcine slaughter and processing establishment, the FSIS auditor verified that an in-plant veterinarian conducts ante-mortem inspection on the day of slaughter by reviewing the incoming registrations and identification documents. The assigned veterinarian observes all animals from both sides at rest and in motion in designated holding pens prior to slaughter in order to determine whether they were fit for slaughter and for human food purposes. The designated holding pen for sick or suspect animals is maintained in the audited establishment for further examination of these animals, as needed. The FSIS auditor verified that implementation of the ante-mortem inspection and the humane handling of animals is meeting Regulation (EC) No 854/2004, Law on Veterinary Activities, Animal Welfare and Protection Act; Regulation (EC) No 1099/2009, protection of animals at the time of killing; and CCA's inspection requirements.

The *Veterinary Act* also requires that only veterinarians conduct post-mortem inspection. The FSIS auditor assessed post-mortem inspection examinations through on-site record reviews, interviews, and observations of veterinarians performing post-mortem examinations in one porcine slaughter and processing establishment that was audited. The FSIS auditor observed and verified that the inspection personnel were implementing proper presentation, identification, examination, and disposition of carcasses and parts. The FSIS auditor observed the performance of the in-plant inspection personnel as they examined the heads, viscera, and carcasses to ensure that the proper incision, observation, and palpation of required organs and lymph nodes is done in accordance with Regulation (EC) No 854/2004 and CCA's inspection requirements.

The FSIS auditor also reviewed in-plant inspection documentation of daily, at least once per shift at processing establishments and throughout the time that establishments are conducting slaughter at slaughter establishments, verification activities and interviewed in-plant inspection personnel. These daily verification activities were being conducted properly. They included direct observation and review of establishment records of establishment activities, including HACCP, Sanitation Standard Operating Procedures (SSOP), Sanitation Performance Standards (SPS), and microbiological sampling programs. Inspection records are standardized through *e inspector* application and implemented in all United

States-certified establishments intending to export to the United States. This intranet application is available for review and verification by the inspection officials at the CCA, regional, and branch levels.

The FSIS auditor verified that the CCA had controls in place for product shipment security, including shipment between United States-certified establishments, and prevention of commingling of product intended for export to the United States with products intended for domestic or other third country markets. In addition, controls were in place in those establishments exporting to the United States for the importation of only eligible meat products from other countries, i.e., only from eligible third countries and certified establishments within those countries. The FSIS auditor also verified that each certified establishment has developed a traceability system for tracking the United States-product throughout its production process in addition to placing the United States-products in a designated area.

During the on-site audit of three United States-certified establishments, the FSIS auditor accompanied and observed the function of SVIs responsible for conducting the periodic (monthly) supervisory reviews. During these reviews, the inspection personnel verify requirements for ante-mortem inspection, humane handling and slaughter requirements, post-mortem inspection, *Salmonella* and generic *Escherichia coli* (*E. coli*) sample collection, verification of pre-operational and operational sanitation monitoring procedures, and HACCP verification activities including the zero tolerance CCP verification in the slaughter establishment. These reviews were recorded on a standard form and included a follow-up section regarding the previous supervisory review findings. The overall sanitary condition of the audited establishments on the day of the on-site audit is the same as documented in the periodic supervisory review reports except those conditions that the FSIS auditor reported as audit findings under sanitation and HACCP components.

The audit indicated that CCA's meat inspection system has the legal authority and a documented regulatory framework to implement requirements equivalent to those governing the system of meat inspection organized and maintained by the United States. FSIS analysis of the CCA's inspection system found that the CCA continues to demonstrate the ability to satisfy the equivalence requirements for this component that are articulated by FSIS import regulations (9 CFR Part 327.2) and is operating at an "average" level for this component.

VI. COMPONENT THREE: SANITATION

The third of the six equivalence components that the FSIS auditor reviewed was Sanitation. An equivalent inspection system must provide requirements for all areas of sanitation and sanitary handling of products including SPS and for the development and implementation of SSOP.

The evaluation of the sanitation component included an analysis of information provided by the CCA through the SRT, interviews, and observations during the on-site portion of the audit. The FSIS auditor verified that the in-plant inspection personnel conduct verification of sanitary conditions in accordance with EU and the CCA inspection requirements.

The FSIS auditor reviewed sanitation plans and records related to the design and implementation of sanitation programs at the audited establishments. The FSIS auditor verified that the pre-operational inspections verification by the in-plant inspector starts after the establishment conducts its pre-operational sanitation. The in-plant inspection personnel conduct the pre-operational verification

inspection daily and in accordance with the CCA requirements. The FSIS auditor also followed the inspection personnel and observed the in-plant inspection verification of operational sanitation procedures at all three audited establishments. These verification activities include direct observation of operations and review of the establishments' associated records. The FSIS auditor reviewed the establishments' sanitation monitoring and corresponding inspections' verification records for the same time period. The auditor noted that the inspection and establishment records mirrored the actual sanitary conditions of the establishment. The audited establishments maintained sanitation records sufficient to document the implementation and monitoring of the SPS and SSOP and any corrective actions taken. The establishment employees responsible for the implementation and monitoring of the SSOP procedures properly authenticated these records with initials or signatures and the date.

In two of the establishments audited, the in-plant inspection's verification or the establishment's sanitation records were the same as the FSIS auditor's on-site observation of the actual sanitary conditions of these establishments on the day of the audit, with one exception. In both establishments, the FSIS auditor observed beaded condensate on the overhead structures. Beaded condensate was not dripping and was not directly above exposed products or food contact surfaces. The auditor discussed this finding with the inspection personnel that this condition may create insanitary conditions and a potential for product contamination. Apart from these findings, the results of the assessment of the sanitation programs conducted by FSIS demonstrated that the CCA implements sanitation requirements equivalent to those of the FSIS system for sanitary handling of products and for the development and implementation of sanitation standard operating procedures.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "adequate" level for this component.

VII. COMPONENT FOUR: HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEMS

The fourth of the six equivalence components that the FSIS auditor reviewed was HACCP. The inspection system needs to require a HACCP plan or similar type of preventive control plan to maintain equivalence. The evaluation of the HACCP component included an analysis of information provided by the CCA through SRT, interviews, and observations during the on-site portion of the audit.

The FSIS auditor verified through record reviews and observations that the in-plant inspection personnel at the United States-certified establishments properly conduct daily verification of HACCP plans in accordance with Croatia's requirements including Regulation (EC) 882/2004, 852/2004, and requirements consistent with 9 CFR Part 417, which include the evaluation of written HACCP programs, monitoring, verification, corrective actions, recordkeeping, and hands-on verification inspection. The in-plant daily inspection verification also includes Critical Control Points (CCP) verification with results entered in in-plant inspection records.

The FSIS auditor visited one slaughter and two processing (canning operation) establishments to determine whether the CCA maintained adequate government oversight for the implementation of HACCP requirements. FSIS also assessed the adequacy of HACCP program verification activities conducted by inspection personnel and establishment management at all three audited establishments.

The auditor observed in-plant inspection verification activities and reviewed the monitoring and verification records generated by the establishments' operators and in-plant inspection personnel. The auditor noted that the in-plant inspection personnel at two audited canning operations conducted inspection verification activities equivalent to those in FSIS Directive 7530.2, "Verification activities in canning operations that choose to follow the canning regulations." This directive provides inspection personnel with instructions for verifying compliance with the regulatory requirements in 9 CFR Part 417 in an establishment that does thermal processing (canning), and uses 9 CFR Part 318, subpart G, as documentation to support a determination that food safety hazards associated with microbiological contamination are not reasonably likely to occur in its operations. The FSIS auditor also reviewed the establishment's corrective actions in response to deviations from CCP critical limits and found that all four parts of the corrective actions are addressed in accordance with Croatia's requirements and meet FSIS' equivalence criteria.

The FSIS auditor conducted an on-site observation and review of the zero tolerance (fecal, ingesta, and milk) control records generated over the past 12 months in one audited porcine slaughter establishment. In addition, the FSIS auditor reviewed the in-plant inspections' associated zero tolerance verification records at this establishment. Both establishment and in-plant inspection monitoring and verification records documented a few deviations from the critical limits. The review of the establishments' corrective actions in response to deviation from zero tolerance critical limits indicated that all four parts of the corrective actions were addressed by establishment employees, and that inspection personnel verified whether the corrective actions were adequate, in accordance with Croatia's requirements to meet FSIS requirements cited in 9 CFR Part 417.3. No non-compliance trends were detected as the result of these document reviews. The FSIS auditor also verified that the zero tolerance CCP monitoring location meets the CCA's requirement, including adequate illumination for proper examination.

The analysis and on-site verification activities show that the CCA maintains equivalence is operating at a level that is borderline "adequate" for this component.

VIII. COMPONENT FIVE: CHEMICAL RESIDUES CONTROL PROGRAM

The FSIS auditor reviewed Chemical Residue Control Programs as the fifth of the six equivalence components. The FSIS criteria for this component include the design and implementation of a program managed by the CCA that conducts effective regulatory activities to prevent chemical residue contamination of food products. To be equivalent, the program needs to include random sampling of muscle, internal organs, and fat of carcasses for chemical residues identified by the exporting countries and FSIS as potential contaminants. The inspection system must identify the laws, regulations, or other decrees that serve as the legal authority for the implementation of this program. The CCA must provide a description of its residue plan and the process used to design the plan; a description of the actions taken to address unsafe residue as they occur; and oversight of laboratory capabilities and analytical methodologies to ensure the validity and reliability of test data. The evaluation of this component included an analysis of information provided by the CCA through SRT, interviews, and observations during the on-site portion of the audit.

The Department for Veterinary Medical Products and Residue Monitoring, under the Veterinary Public Health and Food Safety Sector, manages the national residue program. Its management includes providing direction, coordination, and oversight. The monitoring residue samples are collected by AVs in each slaughter establishment and are shipped under the inspection seal to the assigned residue laboratories. The SVIs are responsible for monitoring the proper implementation of the residue plan in their assigned regions. The SVIs also conduct an annual audit of the residue laboratory in their region, in accordance with the CCA requirements. The FSIS auditor noted that the implementation of the national residue plan at the CCA headquarters, audited laboratory, and establishment levels is proceeding in the manner outlined in the plan, and that sampling is occurring on time and in the manner designated. Analyses are completed in a timely manner, and results are communicated to the CCA and regional offices on a weekly basis.

During the on-site audit, the FSIS auditor visited the Croatian Veterinary Institute – Zagreb laboratory for Determination of Residues, the accredited national reference laboratory for Residues according to HRN EN ISO/IEC 17025 standard by the Croatian Accreditation Agency (HAA). The FSIS auditor interviewed the laboratory quality control personnel and reviewed laboratory documents related to sample receipt, timely analysis, analytical methodologies, recording, reporting results, check samples, and analyst trainings and qualifications. In 2013, the laboratory received a total of 12,493 various samples and conducted 21,493 analyses. Out of the total sample number, 19% were samples under the National Residue Monitoring Program that included analyses of muscle tissue (773 samples), liver (258 samples), kidneys (98 samples) and fat tissue (150 samples). In addition, the auditor reviewed the previous years' HAA laboratory audit reports. The FSIS auditor's review of the documents provided, including the HAA audit reports and corresponding follow-up reports, found no concerns within the CCA's implementation of its chemical residue national program.

This laboratory is also conducting species verification testing with a frequency of one test per each shipment to the United States in accordance with the CCA requirements.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "average" level for this component.

IX. COMPONENT SIX: MICROBIOLOGICAL TESTING PROGRAMS

The last of the six equivalence components that the FSIS auditor reviewed was Microbiological Testing Programs. This component pertains to the microbiological testing programs organized and administered by the CCA to verify that products destined for export to the United States are safe, wholesome, unadulterated, and meet all equivalence criteria.

The evaluation of this component included an analysis of information provided by the CCA through SRT, interviews, and observations during the on-site portion of the audit. The CCA has microbiological testing programs for generic *E. coli* and *Salmonella* in raw products.

Testing for generic *E. coli* in raw products:

The CCA has established process control criteria that are consistent with those listed in 9 CFR Part 310.25(a) in order to verify process control for generic *E. coli* in raw products. The FSIS auditor

verified the microbiological sampling and testing program through document reviews at the CCA headquarters and in one slaughter establishment that was audited. The auditor reviewed the establishment's written program and confirmed that the inspection personnel verify that the United States-certified slaughter establishment audited complies with the CCA regulatory requirements about generic *E. coli* criteria including sampling frequency, technique, and methodology; maintaining records of analytical results; and sampling requirements. The auditor's review of the establishment program and inspection personnel records identified no concerns.

Testing for *Salmonella* species in raw products:

The FSIS auditor reviewed the CCA's *Salmonella* sampling and testing program which is consistent with those listed in 9 CFR Part 310.25(b). The auditor verified that the implementation of the program in the audited United States-certified slaughter establishment is meeting the CCA's requirement, including an equivalence determination in which FSIS granted that *Salmonella* samples could be collected by the establishment employee and analyzed in private laboratories. The FSIS auditor verified that this establishment conducts pathogen reduction performance standard *Salmonella* testing for raw meat product in accordance with the CCA regulatory requirements. The auditor noted that the sampling and testing of porcine carcasses for *Salmonella* species is performed by the establishment personnel and is verified by the CCA weekly. The FSIS auditor's review of records indicated that there have not been any *Salmonella* set failures for the past 6 months. The auditor's review of the establishment program and inspection personnel records identified no concerns.

During the on-site tour of the audited slaughter establishment, the FSIS auditor accompanied and observed the in-plant inspection personnel verification activities for *Salmonella* and generic *E. coli* sample collection. The auditor noted that the sampling and testing for generic *E. coli* and *Salmonella* were properly conducted in accordance with the CCA microbiological sampling procedures.

The products presently exported to the United States are thermally processed commercially sterile canned products, not exposed to the environment after heat treatment. Therefore, FSIS does not require testing for *Listeria monocytogenes* or *Salmonella* for this type of product

During the on-site audit, the FSIS auditor visited the Croatian Veterinary Institute – Zagreb laboratory for Food Microbiology. This is the accredited national reference laboratory according to HRN EN ISO/IEC 17025 standard by the Croatian Accreditation Agency (HAA). The FSIS auditor interviewed the laboratory manager and reviewed laboratory documents related to analyst trainings and qualifications, sample receipt, timely analysis, analytical methodologies, recording and reporting results, and check samples. In addition, the auditor reviewed the previous years' HAA's audit reports. The FSIS auditor's review of the provided documents -- including HAA audit reports and corresponding follow-up reports -- found no concerns within the CCA's implementation of microbiological testing programs.

The analysis and on-site verification activities indicate that the CCA continues to maintain equivalence and is operating at an "average" level for this component.

X. CONCLUSIONS AND NEXT STEPS

The audit results demonstrate that the CCA's food safety inspection system is operating at an "adequate" level of performance. The CCA meets established core criteria for all six equivalence components; however, the audit findings indicate a need for improvement of the CCA's government oversight regarding implementation and verification of SPS requirements. The FSIS auditor conveyed these findings to the CCA inspection personnel at an exit meeting on August 8, 2014, in Zagreb. The CCA understood and accepted the need to address the audit findings to maintain its equivalence.

FSIS will evaluate any information provided by the CCA including the submittal of the CCA's proposed corrective actions in response to the audit findings to assess the effectiveness of the corrective actions through its ongoing equivalence verification methodology.

APPENDICES

APPENDIX A: Individual Foreign Establishment Audit Checklist

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION PIK Vrbovec, Zagrebačka 148, 10340 Vrbovec, Zagreb County	2. AUDIT DATE 08/01/2014	3. ESTABLISHMENT NO. 10	4. NAME OF COUNTRY Croatia
	5. NAME OF AUDITOR(S) Nader Memarian, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/01/2014 Est #: 10 (Porcine Slaughter/Processing) (Croatia)

41/51: The FSIS auditor observed beaded condensate on the overhead structures in the swine carcass transfer cooler. Beaded condensate was not dripping and was not directly above exposed products or food contact surfaces. However, this condition may create insanitary conditions and a potential for product contamination [9 CFR part 416 and 416.17].

61. NAME OF AUDITOR

Nader Memarian, DVM

62. AUDITOR SIGNATURE AND DATE

Handwritten signature of Nader Memarian, DVM, with a date stamp that is partially obscured by the signature.

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Danica Delekovečka cesta 21, 48000 Koprivnica Koprivnica-Križevci County	2. AUDIT DATE 08/06/2014	3. ESTABLISHMENT NO. 139	4. NAME OF COUNTRY Croatia
	5. NAME OF AUDITOR(S) Nader Memarian, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

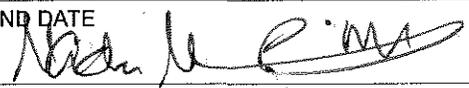
Date: 08/06/2014 Est #: 139 (Canning Operation) (Croatia)

41/51: The FSIS auditor observed beaded condensate on the overhead structures in the corner of a processing room. Beaded condensate was not dripping and was not directly above exposed products or food contact surfaces. However, this condition may create insanitary conditions and a potential for product contamination [9 CFR part 416 and 416.17].

61. NAME OF AUDITOR

Nader Memarian. DVM

62. AUDITOR SIGNATURE AND DATE



United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Gavrilović Gavriloviće trg 1, 44250 Petrinja Sisak – Moslavina County	2. AUDIT DATE 08/04/2014	3. ESTABLISHMENT NO. 399	4. NAME OF COUNTRY Croatia
	5. NAME OF AUDITOR(S) Nader Memarian, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Date: 08/04/2014 Est #: 399 (Canning Operation) (Croatia)

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR

Nader Memarian. DVM

62. AUDITOR SIGNATURE AND DATE



APPENDIX B: Croatia's Response to Draft Final Audit Report



REPUBLIC OF CROATIA
MINISTRY OF AGRICULTURE

10000 Zagreb, Ul. grada Vukovara 78, P.P. 1034
Phone:(+385 1) 61 06 111, Fax: (+385 1) 61 09 201

Veterinary And Food Safety Directorate

CLASS: 322-07/14-01/3367
REGNO: 525-10/0600-15-6
Zagreb, February 11, 2015

Nader Memarian, DVM
Senior International Program Auditor - Veterinary Medical Officer
Office of Investigation, Enforcement and Audit (OIEA)
International Audit Staff (IAS)
USDA - FSIS - OIEA - IAS
1400 Independence Ave., SW
Washington, DC 20250

Subject : Reply to the draft final audit report

Dear Dr. Memarian,

Thank you very much for the extra time that you gave us for response and we apologize for the delay which are caused on finalizing reports of the FY 2014 and planning the activities for the FY 2015.

We are sending you a short reply to the received FSIS draft final audit report from November 25, 2014 related to the inspection carried out by the USDA/FSIS in the Republic of Croatia during the period from July 30 through August 8, 2014. In that time Dr. Nader Memarian visited us with a purpose of checking and officially verifying Croatia's veterinary meat inspection system.

Regarding on identified deficiencies on component one: Government Oversight that indicate a need to improve the CCA's oversight functions, we report that Veterinary and Food Safety Directorate was aware of that problem and write a new "Procedure for the Verification of Official Controls" with enclosed check list. The procedure introduce the verification of effectiveness of official controls carried out by local veterinary inspector and it is pursuant to the Article 8 of Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law and regulations on animal health and welfare. The objectives of verification of the implementation of official controls are to ensure:

- The efficient and effective implementation at the national, regional and local level;
- Regular implementation of official controls, based on risk analysis performed on appropriate frequency,;
- Impartiality, quality and consistency of official controls;
- High level of transparency in the implementation of control activities for the purpose of lawful, efficient and transparent implementation of official controls.

This Procedure is enclosed to this report only in Croatian version but the English version we will send as soon as possible.

Regarding on identified deficiencies on component three: Sanitation that indicate findings in two establishments, we report that corrective measures were initiated immediately by the local veterinary inspector, during the auditing by USDA/FSIS inspector, and has been continued after the audit as follow up. Corrective action measures confirm that all deficiencies identified have been eliminated in short period of time and this report, in Croatian, are enclosed to this letter.

With this letter we declare, that we do not have any objections to the FSIS draft final report of an audit carried out in the Republic of Croatia covering Croatia's meat inspection system, from year 2014.

We would like to thank you very much for all the instructions given to us, as well as for an open professional cooperation extended by USDA/FSIS inspector during the inspection as well as your competent authorities.

Sincerely yours,



Assistant to Minister

Mirjana Matanšić-Pišl, CVO, PhD

Cc:

1. United States Embassy,
Agricultural Specialist: Ms. Andreja Misir
Thomas Jefferson st. 2, 10 010 Zagreb, Croatia



**MINISTRY OF AGRICULTURE
DIRECTORATE FOR VETERINARY AND FOOD SAFETY
SECTOR FOR VETERINARY INSPECTION**

CLASS:322-07/14-01/5826
REG.NO: 525-10/0409-15-5.
Zagreb, 8 January 2015



P/6239802

***PROCEDURE FOR THE IMPLEMENTATION OF
THE OFFICIAL CONTROLS VERIFICATION***

HEAD OF THE SECTOR FOR VETERINARY INSPECTION

Emilija Vojić, DVM

Contents

1. INTRODUCTION.....	2
2. OBJECTIVES	2
2.1. Terms.....	3
3. SUBJECT OF MONITORING	3
4. OFFICIAL CONTROLS IMPLEMENTATION MONITORING PLAN	3
5. VERIFICATION PROCEDURE	4
5.1. Preparation of the annual plan.....	4
5.2. Planning the monitoring implementation	5
5.3. Informing on the monitoring implementation	5
5.4. Course of monitoring implementation.....	6
6. PROCEDURE AFTER THE PERFORMED MONITORING	7

1. INTRODUCTION

Competent authorities have introduced the procedure for verifying the effectiveness of the official controls (verifications) which are implemented pursuant to Article 8 of the Regulation (EC) No. 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food regulations, animal health and animal welfare regulations (OJ 165, 30 April 2004, as last amended by the Regulation (EU) No. 652/2014 – hereinafter: Regulation (EC) No. 882/2004).

This document describes work procedures of senior veterinary inspectors of the Veterinary Inspection Department, Service for Planning and Veterinary Inspection (hereinafter: Department SVIs) and the Heads of Departments of Veterinary Offices (hereinafter: Head of Department), Service for Veterinary Inspection supervising implementation of legislative and other regulations within the competence of the veterinary inspection, legality of work and procedures of all veterinary inspectors in veterinary offices in the area of their competence and verification of effectiveness of implemented official controls on the basis of supervisions carried out over their work (hereinafter: Procedure).

Department SVIs and heads of departments monitor the activities of veterinary inspectors in accordance with the Procedure, with the aim of achieving a high level of uniformity and objectiveness in implementation and reporting. This procedure also sets objectives and priorities in the implementation of control activities.

This procedure is adopted pursuant to Article 16 of the Act on Official Controls Implemented in Accordance with Food, Animal Feed, Health and Animal Welfare (Official Gazette, No. 82/13 and 14/14). Terms with gender meaning used in this Procedure, regardless whether they are used in masculine or feminine gender, equally encompass masculine and feminine gender.

2. OBJECTIVES

Objectives of monitoring the implementation of the official controls are ensuring the following:

- effective and efficient implementation on national, regional and local level;
- regular implementation of official controls, on the basis of risk analysis and of adequate frequency;
- impartiality, quality and consistency of official controls;
- high level of transparency of implementation of all control activities for the purpose of legal, efficient and transparent implementation of official controls.

The purpose of monitoring performed over organization and implementation of the official controls, i.e. of the implemented verifications of the official controls efficiency, is to estimate the functioning of a relevant process on the level of an individual employee of the Veterinary Inspection Service on local and regional level. With the aim of the improvement of official controls implementation on all levels: individual employees, branch offices, veterinary offices and Veterinary Inspection Service, all submitted reports on implemented verification shall be analysed on the level of the head of the Sector and heads of Services twice a year. Head of the Sector shall inform the assistant minister competent for the Directorate for Veterinary and Food Safety on the conclusions.

Monitoring over the implementation of laws and other regulations within the competence of veterinary inspection, legality of work and procedures of all departments-veterinary offices within their competence, as well as verification of the implemented official controls efficiency on the basis of monitoring performed over the activities of the Veterinary Inspection Service employees, shall be implemented pursuant to Article 8 of the Regulation (EC) No. 882/2004, Article 139 of the Regulation on Internal Organization of the Ministry of Agriculture (Official Gazette, No. 80/13,

16/14 and 50/14) and Ordinance on internal order of the Ministry of Agriculture CLASS: 011-01/13-01/85, REG.NO: 525-05/0516-13-1 of 18 September 2013.

2.1. Terms

“Verification” means verifying, by inspection and consideration of objective evidence, whether the determined requirements have been fulfilled.

For the purpose of implementation of this Procedure, the verification consists of:

- an administrative part carried out by the heads of departments and
- control and instructional part performed by the Department SVIs over the activities of veterinary inspectors.

“Control and instructional monitoring” (hereinafter: expert monitoring) entails monitoring the activities of veterinary inspectors with regard to regularity of the implemented official control in a specific area (food safety, animal health, welfare, veterinary-medical products, animal feed, veterinary service organization), with the aim of determining the quality of tasks performed, raising the level of veterinary inspectors specific knowledge, as well as harmonising and improving the veterinary inspection work.

“Administrative monitoring” (hereinafter: administrative monitoring) entails monitoring the activities of a veterinary inspector with regard to administrative procedures of the inspector, as well as to procedures relating to regulations pertaining to records management pursuant to the “Instruction on standardized electronic management of office operations (EDM - Electronic Documents Management) and inspection practices (e-Inspektor)”.

Term veterinary inspector used in this text refers to all veterinary inspectors and senior veterinary inspectors.

3. SUBJECT OF MONITORING

The subject of monitoring are the activities of veterinary inspectors who perform official controls in accordance with valid legislation taking into consideration the organization and implementation of official controls in the branch offices of veterinary offices in which they work and planned and unexpected activities, with the purpose of verifying the effectiveness of the subject official controls.

4. OFFICIAL CONTROLS IMPLEMENTATION MONITORING PLAN

Department SVIs and heads of departments shall prepare the annual plan for monitoring the implementation of laws and other regulations within the competence of veterinary inspections, legality of work and procedures and verification of effectiveness of the implemented official controls, as part of the Work Plan for the current year.

Annual Monitoring Plan preparation criteria:

- monitoring the effectiveness of organization and implementation of official controls should be conducted in the area of all branch offices of particular veterinary offices;
- at least once per year over the activities of each veterinary inspector per different areas, which are determined in an individual annual plan of each veterinary inspector, in the area of administrative supervision.

The criteria depend on:

- the number of entities doing business within the area of activities of the subject branch office/office, which fall within the competence of veterinary inspection;
- annual Report on the realisation of the Plan of official controls of veterinary inspectors in veterinary offices for the previous year;
- results of past controls (reports and recommendations of the Food and Veterinary Office (FVO), Internal Audit Service of the MA) and noncompliances established in the activities of an individual inspector, problems in specific areas which overlap with the occurrences of unexpected or difficult-to-manage situations, received communications that point to problems in the implementation of regulations on food and animal feed and regulations on animal health and protection.

Verification particularly refers to:

- effectiveness of organization of official controls on the level of branch offices and veterinary offices, with a clear distribution of human resources and clearly determined activities per individual employee;
- number of published official controls in relation to the predicted number of controls from the annual Work Plan of a veterinary inspector for the current year;
- keeping records on the implemented official controls;
- procedure of determining the state of facts;
- legal basis of the made decisions, conclusions, solutions with regard to the determined state of facts;
- acting upon the determined noncompliances;
- controlling the implementation of solutions.

Persons performing the verification over the implementation of the official controls should:

- perform activities objectively, impartially, consistently and professionally;
- act properly and with respect to other persons who are implementing official controls and to the entities which are subject of supervision;
- be objective in giving opinions, estimates and recommendations and free from influence of other peoples understandings or personal interests;
- follow written procedures and instructions;
- be educated in the area of their competence for the professional performance of tasks and implementation of supervision in a consistent way.

5. VERIFICATION PROCEDURE

5.1. Preparation of the annual plan

Annual plan of the head of department shall be prepared in the manner that administrative supervision is planned over the work of each veterinary inspector at least once a year.

Annual plan of Department SVI shall be prepared in the manner that the supervision is planned in each veterinary office at least once a year according to areas of professional competence.

Annual plan of the Veterinary Inspection Department shall be submitted to the Head of the Veterinary Inspection Service no later than on 15 December of the current year for the following year for the purpose of preparation of the annual plan of the head of department and planning the activities in the annual plan.

Official control performed by the inspector, and which is the subject of verification, shall be part of the annual plan completion of the monitored inspector.

Verification of the official control, i.e. the inspector activities, may also be performed based on the request by the Head of the Sector for Veterinary Inspection regardless of the annual plan.

5.2. Planning the monitoring implementation

Individual monitoring within the annual plan shall be planned quarterly.

By the fifth day in the last month of the current quarter, the Heads of departments shall submit proposals for expert monitoring for the following quarter on e-mail address: dijana.bosec@mps.hr and a copy to the Head of the Sector and Head of the Veterinary Inspection Service. In the proposal, they shall specify the name of the inspector, name of the object/entity and area of verification expertise as well as the explanation why they think the verification should be conducted over that specific inspector in that area of expertise and in that object/entity.

When proposing the inspector and the adequate object/entity to be verified, the head of department shall take into consideration the results of the inspector up to that moment, risk analysis, size of the object/entity, market on which the object/entity sells its products and does business, history of supervisions conducted before over the object/entity and other facts that can influence the decision-making process.

The decision on the inspector who shall be monitored in a specific object/entity, within a specific individual veterinary office shall be made by the Head of Sector upon the proposal of the Head of the office in agreement with the head of the Veterinary Inspection Service, by the tenth day of the last month of the current quarter for the following quarter.

Head of Sector submits the final quarterly plan of monitoring to the Head of Service for Planning and Veterinary Inspections and to the Head of Veterinary Inspections Department no later than on the tenth day of the last month of the current quarter for the following quarter.

The head of veterinary office shall be present at the expert monitoring.

5.3. Informing on the monitoring implementation

Based on the quarterly plan submitted by the Head of the Sector, Department SVIs plan the official trips, upon the previous agreement with the Head of Department for a specific date and place in a specific month of the current quarterly period.

The Plan of the Department SVIs for the current quarterly period shall be prepared and submitted to the Head of Service for Planning and Veterinary Inspection and to the Head of Veterinary Inspection Department by the fifteenth day of the last month of the current quarterly period for the following period.

The Head of Service for Planning and Veterinary Inspection shall submit a notification on the planned expert monitoring for the following quarter via e-mail by the fifteenth day of the last month of the current quarterly period for the next quarterly period to the Head of Veterinary Inspections Service and the Head of Sector for Veterinary Inspections.

The Head of Service for Veterinary Inspections shall submit the quarterly plan to heads of Departments.

The notification shall contain:

- time and place of monitoring,
- described area and scope of official controls implementation monitoring,
- veterinary office/branch office, object/entity to be monitored and the employee of the Veterinary Inspection Service whose activities are the subject of monitoring,
- list of documents (records on the performed controls and taken measures, etc.) which shall be prepared for the monitoring implementation.

5.4. Course of monitoring implementation

1. Verification shall start with the administrative monitoring by the head of department, who shall review the official documents in e-Inspector system, (head of department may perform the preparation without going to the veterinary office branch office by reviewing the e-Inspector on the basis of weekly and monthly controls of the monitored veterinary inspector activities), whereby the head of department shall collect and analyse all necessary documentation on the activity which is the subject of supervision (record, decisions, charges proposals, reports, plans, letters, communications, etc.). Administrative supervision shall be conducted upon the reception of Department SVI plan on the planned expert monitoring. The administrative supervision shall be finalized before the beginning of the expert supervision.
2. Head of department shall open a file in e-Inspector under the name: Verification of official controls – name and surname of the employee. The first communication in the file shall be the record on the administrative supervision of the employee.
3. During the administrative monitoring, the head of department shall complete the records on the established state of facts with a related checklist (Appendix 1) whereas he/she shall determine and record whether:
 - the Plan of activities of the veterinary inspector was prepared in compliance with the general Plan for official controls of veterinary inspectors in veterinary offices for the current year;
 - the entities/objects which are included in the plan of official controls for the monitored veterinary inspector were defined in the annual work plan;
 - the inspector follows the relevant procedures and operating instructions of the competent body, and when appropriate, checklists from e-Inspector system, during the implementation of official controls;
 - the official controls are performed by using different control methods and techniques as established in the general Plan for official controls;
 - the official controls are performed regularly with an appropriate frequency, as determined in the Plan for official controls of veterinary inspectors in veterinary offices for the current year;
 - the veterinary inspector ordered the measures for the removal of the incompliances established during official controls in the subject monitoring procedures; whether he/she carried out a follow –up of the implementation of the prescribed corrective measures by the entity, after the expiry of the period stated the decision and whether he/she initiated the prescribed sanctioning measures in compliance with criminal provisions;
 - the monitored veterinary inspector is familiarized with the provisions of the relevant legal regulations and whether he/she regularly checks the updated relevant legal regulations;
 - the monitored inspector knows and manages computer applications which are used for performing veterinary activities (VETI; JRDŽ; NŽP; TRACES; LYSACAN; SLKM; E-INSPEKTOR; EUD, UPISNICI NADLEŽNOG TIJELA, EURLEX - etc.);
 - the veterinary inspector acts in compliance with the principles of office operations.
4. Prior to expert monitoring of the implementation of the official controls, Department SVI shall open a file in e-Inspector under the name: Expert monitoring of the employee – name and surname of the employee. The first communication in the file shall be the official records on the expert monitoring of the employee.
5. During the official control, the monitored veterinary inspector shall make the records on the established state of the facts with a related checklist and shall perform the official control over the object/entity. The veterinary inspector shall specify the Department SVI and the head of

department as present. The records shall contain all of the established facts, with a clear conclusion and opinion. The veterinary inspector shall list the Department SVI who performs expert monitoring and the head of department who performs administrative monitoring as present in the e-Inspector and the records. Other official persons present during the implementation of the official control shall be specified as present as well.

6. Department SVI shall perform the expert monitoring of the veterinary inspector in which he/she shall determine whether the veterinary inspector has established all facts correctly during the official control. If he/she notices that the veterinary inspector missed to notice certain facts or determined them falsely, the Department SVI shall take over the management of this part of monitoring until the actual state of facts is established and shall educate the veterinary inspector on this. The very intervention of the Department SVI shall be done in a considerate manner, without interrupting the course of the official control and making a bad impression with the entity. After establishing the relevant state of facts, further implementation of the official control shall be continued by the competent veterinary inspector.
7. Before concluding the records and signing by the party (responsible person of the entity/object) the records shall be checked by the Department SVI and if he/she considers that corrections and/or amendments of the records should be made, he/she shall report that to the head of department and monitored inspector without the presence of the party.
8. During the expert monitoring, the Department SVI shall make an official record in which he/she shall establish and record whether the monitored veterinary inspector:
 - regularly enters and identifies the entity/object (all relevant data: approved number, activities, data on the responsible person and other data from the valid decision);
 - uses an adequate checklist;
 - considers all of the facts, based on which answers are entered in the checklist;
 - performs an in-depth analysis of the issues and checks the records documentation and state of the facts in order to draw correct conclusions when completing the checklist;
 - whether the correction and/or amendment to the records was necessary;
 - determined noncompliances during the previous controls, for which it can be presumed that they had existed at the time of conducting the previous controls.

The records of the competent veterinary inspector shall be attached to the official records.

6. PROCEDURE AFTER THE PERFORMED MONITORING

Within three days from the conducted supervision, the Department SVI shall prepare a Report on the expert supervision containing recommendations and opinion (Appendix II), which shall be to the head of department and the head of Service for Planning and Veterinary Inspection in electronic form.

Head of department shall prepare a Report on verification (Appendix III) within three days from the receipt of the Report on the expert monitoring from the Department SVI.

The Report on verification shall be prepared based on the Report on administrative monitoring and the Report on expert monitoring, and shall contains findings, opinion and recommendations.

The recommendations may be:

1. a compliment to an employee;
2. dissemination of best practice examples to other branch offices and offices;
3. getting acquainted with relevant legislation, guides, instructions, procedures, etc.
4. preparation of reports on the adopted findings on relevant legislation, guides, instructions, procedures etc.;
5. educations in the form of trainings and workshops;
6. identification of mentors;
7. acting in compliance with the Act on Civil Servants;
8. other.

The head of department shall submit the Report on verification in electronic form to the Head of Sector, Head of Veterinary Inspection Service, Head of Service for Planning and Veterinary Inspection, Department SVI who conducted the expert monitoring and to the monitored veterinary inspector.

The head of department shall be the person in charge for the implementation of.

The head of department shall be responsible for the implementation of recommendations, manner of implementation, determining the persons for the implementation of recommendations, setting the deadlines for the implementation of recommendations, as well as for the control of the implementation.

The longest deadline for the implementation of recommendations shall be 30 days.

After the expiration of the deadline for the implementation of recommendations, the head of department shall submit a report on the implementation of the recommendations in electronic form to the Head of Sector, Head of Veterinary Inspection Service, Head of Service for Planning and Veterinary Inspection, the Department SVI who performed the expert monitoring and the monitored veterinary inspector.

7. ANNUAL REPORT ON IMPLEMENTED VERIFICATIONS

The Sector for Veterinary Inspection shall prepare annual reports on the performed verifications in which all data from the report on verification shall be processed.

The annual report shall contain the number of implemented verifications, the number of monitored inspectors per branch offices, offices and competent areas of expertise, number and manner of implementation of the recommendations, conclusions, and guidelines for the following period in which area of local and expert competence requires further system improvement.

The annual report shall be prepared by 15 January of the current year for the previous year and sent to the head of authority – assistant to the minister in charge of veterinary.

The annual report on the implemented verifications shall be a constituent part of the annual plan of veterinary inspection for the following year.

8. APPENDICES

Appendices which are also an integral part of this Procedure are the following:

Appendix I: Records on administrative supervision with a checklist

Appendix II: Report on expert monitoring

Appendix III: Report on verification

APPENDIX I



REPUBLIC OF CROATIA
MINISTRY OF AGRICULTURE
 DIRECTORATE FOR VETERINARY AND FOOD SAFETY
 SECTOR FOR VETERINARY INSPECTION
 SERVICE FOR VETERINARY INSPECTION
 DEPARTMENT – ?
 BRANCH OFFICE - ?

CLASS: 322-07/? - ? / ?
 REG.NO: 525-10/ 0000 - ? - ?
 IN? , day?.month?year?

RECORDS

on the control of administrative work of the veterinary inspector, conducted in

Subject: control of the civil servants activities (name and surname, title, SVI or VI), over the implementation of legal and sub-legal regulations falling within the competence of veterinary inspection, legality of work and procedures for the period from ---to.

The control was conducted by the Head of Department of the Veterinary Office xxx (name and surname, title):

Civil servant:

Control of civil servant's work over the implementation of official controls and inspection is conducted pursuant to the provisions of Article 8 of the Regulation (EC) No.882/2004, Article 139. of the Regulation on the Internal Structure of the Ministry for Agriculture (Official Gazette No.80/2013, 16/2014 and 50/2014) and the Ordinance on the internal order of the Ministry of Agriculture, Class: 011-01/13-01/85, Reg.No:525-05/0526-13-1 from 18 September 2013.

Within the meaning of the provisions of Article 52 of the Act on General Administrative Procedure (Official Gazette No. 47/09), the Party was informed on the right to participate in all phases of the procedure, as well as on the right to make a statement on all facts and circumstances established in this inspection, determined by the veterinary inspection.

Started at 00:00 hours.

FINDINGS

Through the performed control over the activities of the civil servant _____, the following was established:

Data on senior veterinary inspector or veterinary inspector (name and surname, title, ID number, classification number from the decision on the appointment)	
Local competence	
Additional tasks in the branch office of the veterinary office (head of the branch office, residue coordinator, animal feed coordinator, TRACES system control, president or vice-president of regional crisis management committee, etc.)	
Personal work plan for the current year submitted for review	
Number of supervisions according to annual work plan per facilities	
Number of performed planned supervisions from the beginning of the year until the verification	
Number of conducted unplanned supervisions from the beginning of the year until the verification	
Number of decisions issued, including verbal decisions, from the beginning of the year until the verification	
Number of performed controls of the decisions follow-up from the beginning of the year until the verification	
Number of submitted charges proposals from the beginning of the year until the verification	
Number of criminal charges from the beginning of the year until the verification	
Number of taken official samples from the beginning of the year until the verification	

Number of certificates issued from the beginning of the year until the verification

Request.	Findings			State noticed.
	S	N	N/A	Note
PREPARATION OF THE RECORDS				
Veterinary inspector prepares the records during the performance of the official control, investigation, inspection, verbal discussion or taking a verbal statement by the party.				
The records contain the title of the legal public authority performing the monitoring.				
The records state the place, date and hours of the monitoring performed.				
The records state the subject of supervision.				
The records state the name of official persons, present parties and persons authorized for their procedures.				
The records state the description of the course and contents of the actions performed in the procedure.				
The records specify statements given by the parties in the procedure, as well as documents used as an addition to monitoring.				
At the end of the records, it is specified that the records were read and that there was no objection, or in case there were objections, their short summary is provided.				
Persons making the statements signed the record directly next to their statements and on the bottom of each page containing their statement.				
Nothing was added or amended in the signed and concluded records.				
Annex to the already concluded records is entered as an annex to the records signed by an official person and the person who proposed the addition of the annex.				
The records specify if some of the present parties refused to sign the records or to leave the location before the conclusion of the records, as well as the reasons why the signature was withheld.				
VETERINARY ACT (Official Gazette, No. 82/13, 148/13)				
If, when performing the inspection, the veterinary inspector determined that the Veterinary Act (Official Gazette, No. 82/13, 148/13), or other regulations on the basis of which he/she is authorized to act, were not applied or were not applied in a proper manner, he/she ordered the removal of the irregularity by a decision, determining the deadline within which the irregularities shall be removed.				
Veterinary inspector issued a decision immediately, and no later than within 15 days from the performed monitoring.				
If needed, until issuing a decision on committing an offence or criminal conviction, the veterinary inspector temporarily seized the documents and objects which can serve as evidence in an offence or judicial procedure.				
The veterinary inspector issued the certificate on temporary deprivation of documents or objects.				
The veterinary inspector who temporarily seized documents and objects, pressed criminal charges or filed a request for initiating infringement proceedings within 48 hours.				
If, during the inspection, the veterinary inspector established that an offence or criminal act was committed, he/she submitted a request for initiating infringement proceedings or pressing criminal charges immediately and no later than within the period of 15 days.				
FOOD ACT (Official Gazette, No. 81/13)				
If during the official control the veterinary inspector determined incompliance, he/she ordered measures referred to in Article 33				

paragraph 1 of the Act through a written decision resulting from the administrative procedure				
If during the official control the veterinary inspector determined that there was a risk for human health which requires certain measures to be taken immediately and if there was danger from concealing, changing or destroying food or animal feed or evidence if the measure is not taken immediately, he/she made a verbal decision in the records with an immediate term of execution.				
Pursuant to the provisions of the Act on General Administrative Procedure (Art. 97. par. 2 and 3), the veterinary inspector issued a verbal decision in a written form within the deadline.				
The veterinary inspector performed the controls of the decision execution within the deadlines they established in the decision.				
The veterinary inspector filed charges proposals if the food business operator did not act in accordance with the decision specifying the measure, did not submit all necessary documentation or enabled insight into documents requested during the official control.				
The veterinary inspector filed charges proposals when other offences referred to in Article 34 of the Act were established.				
ACT ON OFFICIAL CONTROLS IMPLEMENTED IN ACCORDANCE WITH FOOD, ANIMAL FEED, HEALTH AND ANIMAL WELFARE (Official Gazette, No. 81/13)				
The veterinary inspector performing official controls in compliance with this act as well as in compliance with special regulations calling upon the implementation of official controls in compliance with the Regulation (EC) No. 882/2004, ordered the removal of determined irregularities by a decision, specifying the deadline within which they shall be removed.				
The veterinary inspector made a decision immediately, and no later than within the deadline stipulated by a special regulation.				
If during the official control the veterinary inspector determined that there is a risk for human health requiring certain measures to be taken immediately and if there was danger from concealing, changing or destroying food or animal feed or evidence if the measure is not taken immediately, he/she issued a verbal decision in the records with an immediate period of execution.				
Pursuant to the provisions of the Act on General Administrative Procedure, the veterinary inspector made a written communication of the decision within 8 days.				
The veterinary inspector performed the controls of the decision execution within the deadlines they established in the decision.				
The veterinary inspector filed charges proposals if the entity did not fulfill the decision ordering the performance of an action or the decision stating the measures.				
The veterinary inspector filed charges proposals if the entity did not fulfill the verbal decision ordering the execution of measures.				
The veterinary inspector filed charges proposals when other offences referred to in Article 31 of the Act were established.				
ACT ON FOOD HYGIENE AND MICROBIOLOGICAL FOOD CRITERIA (Official Gazette, No. 81/13)				
If during the official control the veterinary inspector determined incompliances, he/she ordered measures through a written decision referred to in Article 14 par. 1 of the Act.				
If the veterinary inspector during the official control determined that there was a risk for human health which requires certain measures to be taken immediately and if there was danger from concealing, changing or destroying food or animal feed or evidence if the measure is not taken immediately, he/she made a verbal decision in the records with an immediate period of execution.				
In the implementation of official controls over the activities for				

which it is stipulated by a specific regulation on official controls, i.e. a bylaw regulating registration and object approval procedures, that they shall be registered in the register of competent authorities, i.e. that for performing these activities a decision by the ministry is required, the veterinary inspector shall temporarily forbid the performance of these activities to the monitored food business operator by a verbal decision, until removing insufficiencies, and immediately proceeded to execute the decision without adopting a special act on the permit of execution in cases the activity was performed without the registration in the register of the ministry or if the activity was performed without the minister's decision.				
In line with the provisions of the Act on General administrative Procedure (Art 97. par. 2 and 3), the veterinary inspector adopted the verbal decision in written form within the deadline.				
The veterinary inspector performed the controls of the decision execution within the deadlines they established in the decision.				
The veterinary inspector filed proposals for charges if the entity did not fulfill the decision ordering execution of the action or the decision stating the measure.				
The veterinary inspector filed proposals for charges when other offences specified under Articles 15 and 16 of the Act.				
ACT ON THE IMPLEMENTATION OF THE EU REGULATION ON ANIMAL PROTECTION (Official Gazette, No. 125/13)				
During the inspection the veterinary inspector proceeded according to the Regulation (EC) No. 1255/97 i.e. Article 17 of the Act.				
During the inspection the veterinary inspector proceeded according to the Regulation (EC) No.1/2005 i.e. Article 18 of the Act.				
During the inspection the veterinary inspector proceeded according to the Regulation (EC) No.1099/2009 i.e. Article 19 of the Act.				
The veterinary inspector filed proposals for charges when offences specified in Article 21 of the Act were determined.				
The veterinary inspector filed proposals for charges when offences specified in Article 22 of the Act were determined				
The veterinary inspector filed proposals for charges when offences specified in Article 23 of the Act were determined				
The veterinary inspector filed proposals for charges when offences specified in Article 24 of the Act were determined				
The veterinary inspector filed proposals for charges when offences specified in Article 25 of the Act were determined				
The veterinary inspector filed proposals for charges when offences specified in Article 29 of the Act were determined				
The veterinary inspector filed proposals for charges when offences specified in Article 30 of the Act were determined				
The veterinary inspector filed proposals for charges when offences specified in Article 31 of the Act were determined				
ANIMAL PROTECTION ACT (Official Gazette, No. 135/06, 37/13)				
During the inspection, the veterinary inspector proceeded according to Article 64 of the Act.				
During the inspection, the veterinary inspector proceeded according to Article 66 of the Act.				
During the inspection, the veterinary inspector proceeded according to Article 67 of the Act.				
During the inspection, the veterinary inspector proceeded according to Article 68 of the Act.				
DECIDING UPON ADMINISTRATIVE MATTERS (Act on General Administrative Procedure (Official Gazette, No. 47/09)				
Decision issued by the veterinary inspector consists of heading, introduction, dispositive, explanation, legal aid instruction, signature				

by an official person and stamp of official public-legal authority.				
Introduction of the decision contains the name of the public-legal authority that adopted the decision, competence regulation, personal name and surname, i.e. name of the party and persons authorized for proceedings, short file classification and a note if the proceeding was initiated upon official duty or on the request of the party.				
Dispositive of the decision contains a decision on administrative matter. Dispositive is short and specific.				
Dispositive states deadlines and terms.				
Dispositive is divided in several items. Special item of the dispositive states costs of the proceeding as well as the fact that the complaint against the decision does not postpone execution of the decision.				
Explanation contains short exposition of the party's request.				
Explanation contains determined state of facts, reasons for them being decisive when evaluating individual proofs, reasons for not adopting any of the parties' requests.				
Explanation contains making conclusions in the proceeding, if any.				
Explanation states regulations based on which the administrative matter was decided upon.				
In cases when the complaint does not postpone the execution of the decision, explanation also contains a reference to the act stipulating the latter.				
Legal aid instruction notifies the party if he/she can make a complaint or initiate an administrative dispute, as well as the competent body, deadline and method.				
The veterinary inspector has evidence that the publishing of the submission of the decision to the entity was done in one of the stipulated ways.				
ORDINANCE ON CONTENTS, FORM AND MANNER OF KEEPING VETERINARY INSPECTORS AND OFFICIAL VETERINARIES' INQUEST REGISTERS (Official Gazette, No. 1/13) – REVIEW OF REPORTS AND RECORDS MANAGEMENT REGULATION (Official Gazette, No. 7/09).				
The inspector entered the data from E-inquest register immediately i.e. at the latest within 3 days (communications were created and generated) after the performed supervision or other activity within the implementation of inspection procedure.				
Communications from E-inspector were scanned and saved by the veterinary inspector at the latest within 3 days from the submission of the communication to the party.				
The veterinary inspector during the first communication, i.e. act initiating the file, opened the file cover, and placed the communication i.e. act in the cover of the file, in which other acts of the file would be placed as well.				
Communications in file cover are placed neatly and entered chronologically.				
Communications with deadlines were solved within the given deadlines.				
The file cover remains in the authority even if the file is submitted to other authority for competent procedure, until extraction or submission to the competent archive.				
CONTROL OF COMPUTER APPLICATIONS USE AND VERIFICATION OF DATA IN THEM				
The veterinary inspector regularly checks data in SLKM computer application (if in charge for this area in the Plan), and forbids milk deliveries if needed.				

The veterinary inspector checks data in VETI computer application (prepares official controls, "locking", non-animal products form facilities))				
The veterinary inspector at least once a week performs checks in TRACES computer application with a special reference to timely and regular recording of data in the computer application, and acts in accordance with determined state of facts (if in charge of this area in the Plan) .				
The veterinary inspector at least once a month performs checks in the computer application of the competent authority that serves for recording the dispatch of animal by-products which are not used for human food (BY-PRODUCTS) with a special reference to timely and regular recording of data on the dispatch of non-animal products from objects in the computer application and proceeds in accordance with determined state of facts (if in charge of this area in the Plan).				
The veterinary inspector at least once a month checks registers data in the computer application of the competent authority which serves for recording status of herds and recording animal migrations (Unique registry of domestic animals - JRDŽ) on the area of the Branch office, and proceeds in accordance with the determined state of facts if in charge of this area in the Plan).				
The veterinary inspector at least once a week performs checks in LYSACAN computer application with a special reference to timely and regular recording of data in the computer application, and acts in accordance with determined state of facts				

Based on the conducted control over the work of senior veterinary/veterinary inspector, over the implementation of regulations from the competence of the veterinary inspection, legality of work and procedures from the period from ---- to, the following is determined:

Having read the records, the Head of Department for Veterinary Inspection, veterinary inspector gives the following statement on the latter as well as on the work and procedure:

The Records shall be prepared in three identical copies, of which one is handed over to the veterinary inspector, and two copies are kept by the Head of Veterinary Office.

Concluded on: day? month? year? year 00:00 hours.

Appendices to the Records:

Inspector signature:

Head of Department for Veterinary Inspection signature:

APPENDIX II

Report on expert supervision

Name and surname of Department SVI who performed supervision		
Date of supervision		
CLASS AN REG.NO. of official records (JOP)		
Subject/area of expert supervision		
Subject of official control		
Object/farming/legal/physical entity	Name	
	number (as applicable)	
Local competence	Veterinary office	
	Branch office	
	Locally competent inspector	
Present at supervision	Head of office	
	Locally competent inspector	
	Veterinary inspector/ and branch office	
	Authorized veterinary/ies of the competent authority	
Official control results	Inconsistencies were not determined	
	Greater inconsistencies were determined	
	Smaller inconsistencies were determined	
Total number of inconsistencies according to the appropriate checklist		
Short description of inconsistencies in the object		
Did locally competent inspector during the official control missed to determine insufficiencies for which it may be deemed that they had existed in the time of his/her supervision and as such should have been removed (specify).		
Locally competent veterinary inspector regularly enters and identifies the entity/object of inspection (number approved, activities, data on responsible person and other data from the valid decision);		
Locally competent inspector uses adequate checklist		
Locally competent inspector prepared the records including all stipulated parts		
Locally competent inspector performed the control professionally, and had necessary knowledge from the monitored area		
During the supervision the locally competent inspector received instructions from the area that was the subject of the supervision (describe)		
After the supervision the proposal for improvement/training/procedures was recommended (describe)		

Opinion and proposal of recommendations related to the expert supervision	
Comment	

Signature:

APPENDIX III
REPORT ON VERIFICATION

Data on the monitored employee	Name and surname	
	Senior veterinary inspector/veterinary inspector	
Local competence	Veterinary office	
	Branch office	
Name and surname of the head of department who performed administrative supervision		
Date of administrative supervision		
CLASS and REG.NO. of the records (JOP)		
Name and surname of the senior veterinary inspector of the Department for veterinary inspection who performed expert supervision		
Date of expert supervision		
CLASS and REG.NO. of the report on expert supervision (JOP)		
Area of expert supervision		
Object (number and title) in which expert supervision was conducted		
Verification result	Administrative part	Inconsistencies were not determined
		Smaller inconsistencies were determined
		Greater inconsistencies were determined
	Expert part	Inconsistencies were not determined
		Smaller inconsistencies were determined
		Greater inconsistencies were determined
Short description of inconsistencies		
Opinion		
Recommendations (proposal)		

Date:

Signature: