

**TRANSITION FACILITY 2005  
TWINNING CONTRACT**

Project SI05-IB-AG-01: "Strengthening food safety in primary production"



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"Strengthening food safety in primary  
production"**

DAAC project No	9075
Mission period	8 to 11 May
Reporting expert(s)	Henning Foged
Report send to	Gunnar Sigurdsson, Klaus Bergulf

## 1 End of Mission Meeting

Date for end of mission meeting	11 May 2007
Participants in end of mission meeting	Barbara Trunkelj
Agreed time for next mission	10 – 21 September

## 2 Status for Activities

### Activity A.2.6: Meeting to discuss final draft guideline

#### *Indicators of achievement*

- The final draft was especially discussed at two meetings, namely one with Jose Verbic og KIS on 8 May and another with VURS on 11 May. Conclusions were made on different necessary revisions – see the meeting report below.

#### *Problems/delay*

None

### Activity A.2.7: Propose the relevant cross compliance demands in relation to the formulated guidelines

#### *Indicators of achievement*

- Henning Foged has in connection to this made a cross reference table, that shows which of the 40 codes that transposes the legal requirements of the EU regulations 852/2004, 853/2004, and 183/2005, and he has as well marked those codes which according the EU Commission (According to draft working document: Guidance Document of the Commission Services on the Hygiene Provisions Relevant for Cross Compliance, prepared by Management Committee for Direct Payments, 15 March 2006) must be included in the Cross Compliance criteria.

There are according Henning Foged analysis 19 of the 40 Codes that must be contained

within the Slovenian Cross Compliance criteria.

- Ivan Ambrožič and Matjac Gucek will check consistency between the present CC conditions on hygiene (and thus the Slovenian legislation) and the draft Code, and in case of divergences come up with proposals for either
  - amending the CC criteria;
  - amending the Code; or
  - both amending the CC criteria and the Code.
- Met with MAFRD experts, Marjan Dremelj and Nadja Bacac, that are responsible for the cross compliance criteria and advisor training, and discussed with them how relations between the guideline and the CC will be and issues about the farm adviser training.

Marjan Dremelj summarised and concluded that

- additional training of advisers in the area of food and feed hygiene etc. is certainly needed;
- the certification the project give trained advisers would be an unofficial certificate that could be considered as additional value to the official certificate the advisers would get.

*Problems/delay*

None

Activity A.2.8: Hearing of stakeholders

*Indicators of achievement*

- A meeting was convened with the CAFS management on 10 May, where Henning Foged said that he expects that the CAFS will write a letter to the main stakeholders, asking them for comments, and that he suggests the letter and the final draft of the guideline send to the stakeholders in hardcopies. He emphasized that stakeholders in this connection are organisations, unions, societies and alike that represents primary producers, and that the letter must be addressed to the chairman or such stakeholder organisations. The purpose of this hearing is to avoid complaints after publishing of the guideline, to collect good ideas for improvement of it and to get the best possible ownership to the guideline from the primary producers themselves. An outline for the letter is found in Annex D. Henning Foged said that he wish Martina Zupančič to sign the letter in order to send the signal of the importance of the issue.

*Problems/delay*

None

### 3 Coming actions

Agreed actions before date for next mission (specify action, deadline and responsible person)	<ul style="list-style-type: none"> <li>• Henning Foged will clarify to DPD how we wish those working days distributed on the activities (and as well provide a CV on the IT systems expert we wish to involve).</li> <li>• Henning Foged will make a document on recommendations for safe mixing of feeding.</li> </ul>
Provisional list of actions	

during next mission	
Provisional list of later actions	

#### 4 Other comments and recommendations

Official committee for IT systems development in relation to farm advisory systems	The enclosed document: "Terms of Reference for part of sub-activity A.4.1 dealing with production of a Blueprint for Slovenian IT systems development, here under general priorities, and immediate needs for adviser tools development in relation to food and feed hygiene" can be used (for inspiration or as it is) in connection with the planned proposing of the Minister to establish an official committee to be responsible for the matter.

#### 5 Major Documentation

Annex A	Meeting Report
Annex B	Simple advisory tool concerning milk quality / somatic cells
	Separate file: EXCEL file with formulas for somatic cell index calculation (somatic_cells_uk.xls)
Annex C	Training needs assessment
	Separate file: Slightly updated version of the Code of Good Hygiene Practices ( <u>smernice verzija hlf 110507.doc(1MB)</u> )
	Separate file: Updated version of "Terms of Reference for part of sub-activity A.4.1 dealing with production of a Blueprint for Slovenian IT systems development, here under general priorities, and immediate needs for adviser tools development in relation to food and feed hygiene"
	Separate file: Outline for Terms of Reference for Mission in September
Annex D	Outline for letter to hear stakeholders

## Annex A Meeting Report

**Tuesday 8 May 2007**

### Meeting with CAFS

The programme for the mission was confirmed and finalised, here under added the following points

- meeting with Jose Verbič on Tuesday 8 May at 11:00 in order to be informed about the draft Slovenian legislation to implement the Nitrate Directive, and thereby discuss how the guideline would relate to the Nitrate Directive provisions;
- meeting with Mateja Zjac on Wednesday 9 May from 8:00 to 9:30 about the training needs assessment
- Steering Committee meeting on Wednesday 9 May from 10:00 to 14:00 according distributed agenda – we are supposed to tell about the progress with the elaboration of the guideline;
- meeting Wednesday 9 May at 14:00 with the relevant experts in the Ministry in relation to cross compliance in order to inform them about
  - the guideline elaborated;
  - the plans to consider the relations to cross compliance criteria;
  - the planned training of advisers, which shall licence them to be FAS advisers in relation to food safety; and

listen to their comments and advice in this relation.

- meeting Thursday 10 May with the management of CAFS in order to discuss plans for the mission in September, especially about the plans to support the envisaged development of adviser tools – a list of 19 questions had been prepared by CAFS for the meeting;
- meeting on Friday 11 May with inspection experts concerning relation between the guideline and cross compliance (not confirmed at this stage)

The guideline had been translated to Slovenian, and some suggested changes of grammatical and language nature suggested. The suggested changes were discussed, here under

- It was decided to raise the question at the Steering Committee meeting whether to use the term Codex or Guideline for the document.

### Meeting with KIS, Jose Verbič

Jose Verbič informed about the draft legislation to implement the Nitrate Directive provisions, here under that it is suggested to

- issue two decrees, one about the action programme and another about "the rest", for instance how to calculate the manure storage capacity is already drafted in a decree;
- storage of livestock manure on the field will be allowed if it the livestock manure has first been stored for 2 months in a normal, watertight manure store – it is believed this will make the dry matter so high that there will not be any effluents, and this is a way to make it possible to spread not fresh manure without having 2 expensive manure storages;
- there are no requirements for drain in the manure storages but a requirement to collect effluents and store this for 6 months, but no norms for the amount of effluents;
- the decree includes tables on conversion from livestock to LU (Livestock Units) and amount of produced N in the livestock manure for various livestock types, amount of N in traded manure (which is quite different from the aforementioned table), requirements for kbm or cbm of manure storage capacity - Jose Verbič said bluntly that he did not believe to the figures in

the tables, but that he believes the decrees provisions will require farmers to build more than enough manure storage capacity??!;

- the guideline could include one point about the need for organising manure storages in a way that ensures food and feed is not contaminated with livestock manure and then refer to Verbič's booklet for information about calculation of required manure storage capacity;

Jose Verbič commented further on the draft guideline and said:

- 2: Only 1. class compost (meaning for instance traded sludge) according legislation NN is allowed to use as fertiliser on the fields and the legislation sets maximal values for heavy metals etc. in this, which in fact are so restricted that own produced livestock manure would not be allowed to use on the fields??!! Reference to Verbič booklet (unofficial code of good agricultural practices) about this issue can be made in the guideline.
- 3: The additional remarks will be corrected so that:
  - first bullet is deleted;
  - in third bullet 30 days are replaced with 6 weeks, slurry replaced with stored slurry, not fresh slurry with fresh slurry
  - in fifth bullet settlement is replaced with injection;
  - third bullet is added ..."and only if there are no visible traces of slurry on the grass"
  - third bullet is added ..... "spreading must in that case be done as quickly as possible after the previous cutting or grazing, and preferably during or before rain".
- 10-13: The legislation was consulted regarding water, and it was decided to clarify, by adding a table, in which cases potable water must be used and where water of good quality is sufficient. Probably dairy cows must have potable water for drinking.
- 8: Jose Verbič will later on comment on the relevance of various types of stores.

It was finally discussed that the DAAC way to interpret the somatic cell analyses of milk would be interesting for use in Slovenia. Henning Foged will send the formulas to Jose Verbič and he will, with his colleagues consider implementing this in the reports farmers can achieve after milk recording. See more in Annex B.

### **Wednesday 9 May**

#### Training needs assessment

In a meeting with Mateja Zjac and Stane Levart it was informed that:

- There is no national legislation that implements the provisions of EU Regulation 1782/2003 (Title II Chapter 3) concerning accreditation of farm advisory services and licensing of advisers.
- There is no national legislation that implements the provisions of EU Regulation 1782/2003 concerning accreditation of farm advisory services and licensing of advisers.
- The MAFF has verbally confirmed a national training plan for farm advisers in relation to cross compliance, which was elaborated by CAFS.
- According to this proposal the advisers have been given a three days training of each six hours. The training was repeated three times and held at three different locations in Slovenia, which in total gives nine trainings. In total this has trained 300 CAFS advisers end of 2006. The training was aiming at presenting the legislation related to the cross compliance requirements.
- The Ministry plans to issue a license to those of the advisers that can show that they have been on a farm and checked whether the cross compliance legislation was in order on that farm. The license will be given in May and June 2007.

Steering Committee meeting*Budget:*

A distributed working plan showed only 30 working days for activities 4.1 to 4.4 of component A.4. It was clarified that this was a mistake and that the budget actually covers 44 working days. Danish Plant Directorate agreed to investigate what had happened to the remaining 3 working days as the agreement from the SC meeting in February was 47 working days for those activities, whereof 3 for an IT systems expert that would be provided to Activity A.4.1 from Danish Plant Directorate. Henning Foged will clarify to DPD how we wish those working days distributed on the activities (and as well provide a CV on the IT systems expert we wish to involve).

*The following report on the development of the Guideline was prepared, but was not requested on the meeting:*

1: Henning Foged: The development of the guideline is progressing as planned. After last missions discussions there were elaborated a consolidated English version, which we did and still do consider as a closed to final draft. We have an outstanding issue we would like to consult the meeting about, namely whether to call the document for a guideline or a code?

2: Barbara Trunkelj: The "close to final draft" now has been translated into Slovenian thanks to joint efforts of the RTA assistant and CAFS experts.

3: Henning Foged said that we had met with Jose Verbic and on basis of that have decided to

- strengthen the guidelines and remarks related with sludge (guideline 2);
- same about water (guidelines 10-13);
- improve additional remarks about spreading of manure on grass;
- add an extra guideline about organising of manure storages and refer to Verbic' booklet for details about dimensioning etc.;
- look at the relevance of the presented storage types for feed;

CAFS will after these final revisions send the document in an official way to hear relevant stakeholders and we will look at the relation to the cross compliance criteria.

Meeting with Ministry of Agriculture, Forestry and Food

May 9<sup>th</sup> at 14:00: Met with MAFF experts, Marjan Dremelj and Nadja Bacac that are responsible for the cross compliance criteria and advisor training, and discussed with them how relations between the guideline and the CC will be and issues about the farm adviser training. The Slovenian project leadership from MAFF, as well as well as RTA and RTA-assistant attended that meeting also.

The purpose of the meeting was to inform the responsible experts of MAFF about

- the planned review of the present cross compliance criteria concerning the hygiene packages in the light of the final draft of the guideline; and
- the planned training of advisers.

Marjan Dremelj said that he would appreciate the planned review of the present cross compliance criteria concerning the hygiene packages in the light of the final draft of the guideline – Barbara Trunkelj has organised a meeting Friday 11 May with relevant experts from the inspections for that purpose. Marjan Dremelj said, that the present cross compliance criteria had been described before the guideline was produced, and if we find some discrepancy between the guideline and the present cross compliance criteria, then either of them could be revised.

The plans for training were acknowledged as beneficial and as something that would provide deeper advisory competences in the area of food and feed hygiene and quality matters that the 2 hours presentation of the legislation already made. Nadja Bacac said that she especially likes the

idea of the practical part and that the certification would happen on basis of the presentation of the cases the adviser will be asked to prepare.

Henning Foged asked whether the advisers after the training would be given an official certificate, meaning given by the Ministry and based on legislation, or whether we from CAFS and DAAS side would equip them with a certificate. This question gave basis for a long discussion.

- It was said that the Minister in fact had issued a Decree that approved the cross compliance training already given and that will end with the licensing of advisers in May and June.
- It was discussed, whether there in the longer run would be a need for specialised training of the advisers on top of the general training already given, which introduced the advisers to the legislation.
- It was discussed that the meaning of a (coming) licensed adviser in Slovenia would be different from some other countries – licensed advisers means in other member states that farmers have access to earmarked cross compliance advisory subsidies when they use such licensed advisers.

Marjan Dremelj summarised and concluded that

- additional training of advisers in the area of food and feed hygiene etc. is certainly needed;
- the certification the project give trained advisers would be an unofficial certificate that could be considered as additional value to the official certificate the advisers would get.

### **Thursday 10 May 2007**

#### Meeting with the management of CAFS

In the meeting participated

- Director, Ms Martina Zupančič
- Deputy Director, Mr Anton Jagodič
- Head of Economic Department, Ms Neva Pajnter
- Head of Rural Development Department, Ms Barbara Trunkelj
- Adviser, Mr Robert Leskovšek (statistical analysis and reporting to MAFF)
- Mr Stane Levart (advisor training).

The purpose of the meeting was to give the CAFS management information about the status and plans for the project components that CAFS and DAAS have responsibility for.

Henning Foged said that the guideline/code is almost finished, that Barbara and Lucia works with correction of some details and that a final draft is ready in the middle of next week. Henning Foged said that he expects that the CAFS will write a letter to the main stakeholders, asking them for comments, and that he suggests the letter and the final draft of the guideline send to the stakeholders in hardcopies. He emphasized that stakeholders in this connection are organisations, unions, societies and alike that represents primary producers, and that the letter must be addressed to the chairman or such stakeholder organisations. The purpose of this hearing is to avoid complaints after publishing of the guideline, to collect good ideas for improvement of it and to get the best possible ownership to the guideline from the primary producers themselves. An outline for the letter is found in Annex D. Henning Foged said that he wish Martina Zupančič to sign the letter in order to send the signal of the importance of the issue.

Martina Zupančič concluded, that

- CAFS will make available necessary staff to support the planned activities in the months September to December, here under assist to select farms to use as cases etc. for the

training;

- CAFS will propose to the Minister of Agriculture to establish an official committee to be advise the Minister on IT systems development

Henning Foged said it would be excellent to have an official committee established on it systems development, and that he would improve the ToR for the task in the light of the discussions during the meeting.

### **Friday 11 May 2007**

#### Meeting with VARS

In the meeting participated

- Ivan Ambrožič
- Matjac Gucek
- Barbara Trunkelj
- Henning Foged

Henning Foged said that CAFS and DAAS now have prepared a final draft of the Code of Good Hygiene Practices in the primary production. Henning Foged has in connection to this made a cross reference table, that shows which of the 40 codes that transposes the legal requirements of the EU regulations 852/2004, 853/2004, and 183/2005, and he has as well marked those codes which according the EU Commission (According to draft working document: Guidance Document of the Commission Services on the Hygiene Provisions Relevant for Cross Compliance, prepared by Management Committee for Direct Payments, 15 March 2006) must be included in the Cross Compliance criteria.

There are according Henning Foged analysis 19 of the 40 Codes that must be contained within the Slovenian Cross Compliance criteria.

Henning Foged emphasized, that his analysis was not checked by other persons and could contain mistakes.

It was informed that there presently are 7-8 Slovenian Cross Compliance criteria concerning hygiene, and that there are not controlled yet as this awaits the finalisation of the Code of Good Hygiene Practices. Henning Foged has no English version of the Slovenian Cross Compliance criteria and can therefore not comment on the compliance between the CC criteria and the Code.

Henning Foged referred to the meeting with Marjan Dremelj who concluded that in case inconsistency was found then either of the documents could be revised. This arose some discussions, which ended up with the solution, that Ivan Ambrožič and Matjac Gucek will check consistency between the present CC conditions on hygiene (and thus the Slovenian legislation) and the draft Code, and in case of divergences come up with proposals for either

- amending the CC criteria;
- amending the Code; or
- both amending the CC criteria and the Code.

All participants in the meeting agreed that there for transparency and use of the Code must be a clear reference between the Code and the CC criteria.

It was discussed what the ideal number of CC criteria on hygiene would be:

- Denmark has 15 CC criteria on hygiene
- Bayern has 31 CC criteria on hygiene
- Austria has 56 hygiene codes

Henning Foged said that in case Slovenia selects only to have one CC criteria on hygiene (namely that the Code must be followed) then farmers could only fail on one point, but the risk they fail would be relatively large and the sanctions maybe bigger – if Slovenia on the other hand selects 19 CC criteria on hygiene (take them directly from the Code) then the risk of non-compliance with the points are comparatively smaller as well as the sanctions, but there are more points that farmers can fail on.

It was furthermore agreed, that

- Barbara Trunkelj will send the latest version of the Code to Ivan Ambrožič and Matjac Gucek early next week;
- Henning Foged will make a document with recommendations to farmers concerning mixing of feed with premixtures.

## Annex B Simple advisory tool concerning milk quality / somatic cells

The consultant has recommended all dairy farmers would have the opportunity to get printouts after milk recording where the following information is calculated for each individual cow:

- Contribution of somatic cells to the entire milk production, %
- Index of somatic cell counts (1-5)

An excel file is delivered as a separate file to this mission report from which the formulas can be seen.

The formulas etc. has been handed over to Jose Verbic of Institute of Agriculture because Institute of Agriculture (KIS) is analysing milk recording data and producing the reports for the dairy farmers on that basis, and they are therefore the only institution that could implement the use of the formulas to the benefit of the work of advisers and farmers.

### Use of this IT advisory tool

The idea of this conversion of the raw somatic cell counts is to interpret them so that the farmer easily can identify the problem cows, because a seemingly acceptable somatic cell count could be problematic if the cow has a high milk yield, a low lactation number and is in the middle of the lactation, and vice versa etc. The Danish farmers are offered this list/information and uses it:

- to identify problem cows that needs to be culled or treated in case the herds somatic cell counts should be lowered;
- to base their general decision on culling of cows on along with may other parameters;

#### Instruction to users/farmers concerning the somatic cell index:

- 1 Excellent
- 2 The cow should be kept under observation, there may be given extra attention to correct cleaning of the udder, checking of the milk quality for mastitis (in test cup) and dipping of teats after milking
- 3 Same as above + the cow may be decided for treatment of the udder (organic products or antibiotics, dependent on the situation) according to for instance the seriousness of the cell count for the entire herd
- 4 Same as above + the cow should immediately be treated
- 5 Same as above +/- or the cow shall be slaughtered as soon as possible

Normvalues are set out from a wish

- to have a somatic cell count for the herd that are well under the level where the milk price is reduced
- for the individual cow where there are subclinic mastitis or more severe udder problems

We have in DAAS not made any publications or organised documentation on our analyses that has led to the coefficients and formulas used, but we see that it works in practice.

You may state the formulas were developed by National Centre of Danish Agricultural Advisory Service.

to take decision on treatment of cows although there are no immediate threats of reduction in the milk price, as a high index also means reduced milk yield.

The formulas used are for instance based on our analysis of several hundred thousand lactation curves of dairy cows. Index 1 means everything is fine, index 5 means the farmer must take immediate action.

## Annex C Training needs assessment

Both

### Methodology

The purpose of this note is to validate the ideas of the training activities (Component A.4.1 to A.4.4), especially to ensure that the plans comply with the Ministry's wishes for training of FAS advisers and with the CAFS overall training plans. It is also important to avoid overlap to earlier training.

The present Training Needs Assessment is made by the consultant as a result of various meetings and discussions, whereof the most important meetings comprised

- meeting with Marjan Dremelj and Nadja Bacac of Ministry of Agriculture, Forestry and Food on Wednesday 9 May 2007;
- meeting with Mateja Zjac and Stane Levart of Chamber of Agriculture and Forestry of Slovenia on 9 May 2007.

### Purpose of the training

The goal with the training was defined during the first assessment mission in January 2007 as:

The activity will lead to the certification of at least 20 FAS advisers (trained trainers) complying with 1782/2003 regulation (only for cross-compliance of Regulation EC 178/2002). The trained farm advisors will be able to assist farms/producers in implementing EU general food law for primary production level and EU feed hygiene legislation. The farm advisor assistance should be supported with the guideline elaborated in this project. The trained farm advisor should be able to educate the farmer for appropriate use of the guide on the farm. The trained farm advisors should be also able to train other farm advisers in appropriate using of guide and in farm advising especially for cross compliance of regulation EC nr. 178/2002. The training would consist of

- Theoretical part with case studies
- Practical exercise.
- Test
- Certification

It would be an important fundament for the training to develop 2-4 simple adviser tools that would enable the trained advisers to assist farms that do not comply with good hygiene standards to improve their situation to

- Determine realistic goals for the food quality related situation in the farm;
- Plan the reaching of those goals
- Monitor the plan is followed
- Monitor the economic aspects of farm planning (optimising farmers economy)

(For instance to set goals for the milk quality, plan necessary investments, training of milkers, culling of "bad" cows, etc., and follow up by checks from the adviser)

The purpose of the training is after the meeting with Ministry of Agriculture, Forestry and Food formulated as:

**The training of around 20 farm advisers will be additional to the general training in Autumn 2006**

and officially licensing of them by MAFF in June 2007 in relation to EU Regulation 1782/2003.

The training will build on the already given 2 hours general introduction to the legislation called the hygiene packages, which was a part of the aforementioned already performed training, and which enable the advisers to check whether a given farm complies with the legislation.

The training will enable advisers to function as regional experts or regional specialists in food and feed hygiene, and additional to the ability to check the farms for compliance with the legislation the training will provide competences in the following areas:

- Determine realistic goals for the food quality related situation in the farm, and here under
  - assess the relevance of participation in private food quality programs, EurepGAP schemes, organic farming or other certified productions;
- Plan the reaching of those goals, and here under
  - assist if necessary to develop and implement risk analyses and HACCP schemes;
  - assist if relevant with fund raising (Leader+ and other programmes) and project development in relation to food and feed hygiene, certified productions, branding, etc.;
- Monitor the plan is followed, here under
  - assist of relevant with relevant advisory tools; and
- Monitor the economic aspects of farm planning (optimising farmer's economy), here under
  - calculate economic consequences of reaching the established goals.

The training would consist of

- Theoretical part with case studies
- Practical exercise.
- Test
- Unofficial certification (done by CAFS and DAAS)

## Training activities

The specific activities to prepare and conduct the training are as follows:

#	Sub-activity	Description	Working days	Period
A.4.1	Elaborate cases	Determine relevant cases, for instance <ul style="list-style-type: none"> <li>• Milk quality at a dairy farm</li> <li>• Phytosanitary agent use at a vegetable or fruit producer</li> <li>• Planning the rotation of crops in order to optimise phytosanitary use</li> <li>• Feed hygiene at a pig farm</li> </ul> Formulate goals for farms with respect to the selected issues, plans to reach the goals and system for monitoring the reach of the goals. Produce 2-4 simple adviser tools as part of this process that can be re-used	22	10-21 September

#	Sub-activity	Description	Working days	Period
		by other advisers. Optimising farmer's economy will be one of the most important parts of planning. The economic FAS will be trained how to take over the technological plan and combine and transfer the production plan to a financial budget for the whole farm. The activity includes also the development of a Blueprint for the IT systems development for farm advice in Slovenia to ensure the simple advisory tools would comply with an overall plan.		
A.4.2	Organise the training	Identify advisers to train, organise premises, decide time, gather other relevant training material, here under the control guidelines	8	9, 10, 11, 22, 26 October
A.4.3	Perform the training	Perform the training	10	23, 24, 25 October + 19 and 20 November
A.4.4	Certification	Evaluate the test results etc.	4	10 and 11 December

The activity plan for the training was changed from the original plans made by the assessment mission in January, in the way that the input of working days from the Danish Twinning partner is reduced with 5 to 47 working days.

### Ministry's wishes for training of FAS advisers

Slovenia has not developed national legislation to accredit a Farm Advisory System (FAS) and to train and licence the FAS advisers. The Minister of Agriculture is said to have issued a Decree that confirms plans for cross compliance training of CAFS' advisers, developed by CAFS.

The training plan, already implemented, comprised a three days training of each six hours. The training was repeated three times and held at three different locations in Slovenia, which in total gives nine training events. In total this has trained 300 CAFS advisers by end of 2006. The training was aiming at presenting the legislation related to the cross compliance requirements.

The Ministry plans to issue a license to those of the advisers that can show that they have been on a farm and checked whether the cross compliance legislation was in order on that farm. The license will be given in June 2007.

Marjan Dremelj of MAFF has on this background concluded that

- additional training of advisers in the area of food and feed hygiene etc. is certainly needed;
- the certification the project gives trained advisers would be an unofficial certificate that could be considered as additional value to the official certificate the advisers would get.

### Earlier training done

A PowerPoint presentation (in Slovenian language) which had been used for the informing of all advisers about food safety and hygiene issues has been reviewed. The presentation supported a 2 hours session on the matter, which all CAFS advisers (around 300 advisers) received.

The advisers were not given any handouts, but could take notes.

The presentation clarifies the underlying EU legislation and their objectives.

There are not yet made any tests.

The presentation was made far before the guideline was prepared.

The presentation does not relate to cases or examples from Slovenian farms.

The presentation does not give any guidance to the ways advisers can assist farmers with this legislation.

## CAFS overall training plans

CAFS is doing training of advisers according to needs arisen.

Henning Foged got support to the idea of dividing the advisers in 4 groups as regards the envisaged expertise they shall have on food safety and hygiene:

Level	Issues familiarised with	Level of competence – functions the trained adviser can undertake
1	<ul style="list-style-type: none"> <li>• Related legislation</li> </ul>	<p><b>Basic</b></p> <ul style="list-style-type: none"> <li>• Principally able to handle a checklist to control if a farm complies with the legislation.</li> <li>• Typically those, who wish to be informed but without having ambitions to actually work with advising on hygiene etc. – typically leaders</li> </ul>
2	<ul style="list-style-type: none"> <li>• Related legislation</li> <li>• Checklist and control instruction used by the inspection bodies</li> <li>• Food and feed hygiene related classification and grading etc.</li> <li>• EurepGAP</li> <li>• Risk assessment of process</li> <li>• HACCP scheme</li> <li>• Private food quality programs, organic farming or other certified productions;</li> <li>• Project management, including fundraising and knowledge to programmes relevant for funding food and feed hygiene related projects</li> <li>• Basic knowledge to (economic) farm production planning, including investment planning and financial planning</li> </ul>	<p><b>Regional Specialist</b></p> <ul style="list-style-type: none"> <li>• Able to handle a checklist to control if a farm complies with the legislation</li> <li>• Under supervision of a regional or national expert able to <ul style="list-style-type: none"> <li>○ Determine realistic goals for the food quality related situation in the farm, and here under <ul style="list-style-type: none"> <li>▪ assess the relevance of participation in private food quality programs, EurepGAP schemes, organic farming or other certified productions;</li> </ul> </li> <li>○ Plan the reaching of those goals, and here under <ul style="list-style-type: none"> <li>▪ assist if necessary to develop and implement risk analyses and HACCP schemes;</li> <li>▪ assist if relevant with fund raising (Leader+ and other programmes) and project development in relation to food and feed hygiene, certified productions, branding, etc.;</li> </ul> </li> <li>○ Monitor the plan is followed, here under <ul style="list-style-type: none"> <li>▪ assist of relevant with relevant advisory tools; and</li> </ul> </li> </ul> </li> </ul>

Level	Issues familiarised with	Level of competence – functions the trained adviser can undertake
		<ul style="list-style-type: none"> <li>○ Monitor the economic aspects of farm planning (optimising farmer's economy), here under <ul style="list-style-type: none"> <li>▪ calculate economic consequences of reaching the established goals.</li> </ul> </li> </ul>
3	<ul style="list-style-type: none"> <li>• Principally the same as the regional specialist</li> </ul>	<p><b>Regional expert</b></p> <ul style="list-style-type: none"> <li>• Principally the same as a regional specialist, but in an independent way</li> <li>• Ability to organise the work for regional specialists due to more involvement in the matters.</li> <li>• A regional expert would have food and feed hygiene matters as one of her/his main duties.</li> </ul>
4	<ul style="list-style-type: none"> <li>• Related legislation (including national and EU legislation and policies)</li> <li>• Checklist and control instruction used by the inspection bodies</li> </ul>	<p><b>National expert</b></p> <ul style="list-style-type: none"> <li>• The national experts are those who have taken part in developing the legislation, the Code, who take part in work groups on national and EU level.</li> <li>• Able to advise and train regional experts.</li> </ul>

Probably it would due to the importance of food and feed hygiene be relevant for the CAFS to have 1-2 national experts and 1 regional expert per region and 1-2 regional specialists per region. Food and feed hygiene seem to get a larger and larger importance and the number of advisers on the different levels should develop along with that.

The training we will do in the project is targeting level 2 and 3 – regional experts and specialists.

## Annex D Outline for letter to hear stakeholders

[Date]

[Name]

[Address]

### Concerning Code of Good Hygiene Practices in Primary Production

EU's legislation about food and feed hygiene, found in EU regulations 178/2002, 852/2004, 853/2004, and 183/2005, the so-called hygiene packages, imposes important regulations on the primary production.

A part of this legislation is related to Cross Compliance and the primary producers will therefore be controlled and sanctioned for both the hygiene legislation as well as for the cross compliance.

Chamber of Agriculture and Forestry of Slovenia is actively participating in a project to develop a Code of Good Hygiene Practices in Primary Production (a draft of the Code is enclosed) with the purpose to make the complicated legal requirements more clear for the primary producers. The Code will be send to all primary producers.

The Code contains a list of 40 points, and we recommend the producers to check that their practices comply with these points in order to avoid any sanctioning. The points may be legally based, but they describe only normal and good farming practices, and most farmers would not need to change practices to comply with the points.

Before we send the final version of Code to Ministry of Agriculture, Forestry and Food we would kindly ask you to review it and send us written comments and suggestions for revisions latest 25 May 2007. Ministry of Agriculture, Forestry and Food is planning to organise a meeting by end of May (exact date and placed will be informed by the Ministry later), where you will have possibility to present and discuss your proposed amendments.

Best regards,

Martina Zupančič

Director

Chamber of Agriculture and Forestry of Slovenia