



|             |  |
|-------------|--|
| Chairperson | Mr D P Ford  |
| Cell        | 082 898 7194   |
| E-mail      | <a href="mailto:dave@safeedlot.co.za">dave@safeedlot.co.za</a> |
| Tel         | (012) 348 2239/14<br>(012) 348 2190/72                         |
| Fax         | (012) 348 2280   |
| Secretariat | Ms M de Lange  |
| Cell        | 079 162 6465   |
| E-mail      | <a href="mailto:manager@rmif.co.za">manager@rmif.co.za</a>     |

347 Church Avenue | Lynnwood | 0081

---

Dr Mphane Molefe  
Deputy Director: Veterinary Public Health  
Department of Agriculture, Forestry and Fisheries  
G11 Delpen Building, Cnr Union and Annie Both Streets  
Riviera, Pretoria  
[MphaneM@daff.gov.za](mailto:MphaneM@daff.gov.za)

24 August 2015

Dear Dr Molefe,

**RED MEAT INDUSTRY FORUM COMMENT ON DRAFT MEAT INSPECTION SCHEME DOCUMENT SUBMITTED BY THE DEPARTMENT OF AGRICULTURE, FORESTRY AND FISHERIES IN TERMS OF THE COURT ORDER GRANTED ON 13 APRIL 2015 AS PART OF THE MEAT INSPECTION WORKING GROUP DISCUSSION AUGUST 2015**

1. The Red Meat Industry Forum (“the Forum”) received the implementation plan: meat inspection service in South Africa approved by the Minister of Agriculture, Forestry and Fisheries (“the Minister”) along with a draft of the proposed meat inspection scheme.
2. The Forum acknowledges that the majority of the approved implementation plan consists of the recommendations proposed to the Minister in March 2013 by the Meat Inspection Working Group consisting of departmental and industry representatives.
3. The reasons why certain recommendations were not considered were highlighted in the approved implementation plan as well as the seriousness of the lack of implementation (refer to the Conclusion Chapter 15 of the implementation plan).
4. The Forum provided full feedback to the Forum council on 19 August 2015, but indicated that directly affected parties would have the opportunity to consult with their respective industries and comment on the meat inspection scheme once gazetted for public comment.

5. In relation to the Court Order granted on 13 April 2015, the approved implementation plan outlines the step by step actions to first legalize the services of the meat inspectors currently employed and then provide for independence in later phases. The implementation plan does however still provide for exemption to certain species which remains a point of contention for the Red Meat Industry.
6. The amendments to the meat inspection scheme should remain subject to the Court Order which required independent meat inspection services to all size throughput abattoirs and across all species.
7. The first phase of the implementation plan provides an important point of departure to legalize the services of the meat inspectors currently employed, but this phase does not provide for independence in all size throughput abattoirs as envisaged by the Meat Safety Act, 2000 (Act. No. 40 of 2000) (“the Act”).
8. The Red Meat Industry remains unsure why regulatory control was not included in the authorization of these persons in the draft meat inspection scheme as envisaged later in the implementation process.
9. The proposed and approved plan for the second phase of the implementation plan indicates Option 1 (a Government Service) despite the reservations documented during all of the public consultations. The Department of Agriculture, Forestry and Fisheries (“the Department”) had in fact phased out the meat inspection service provided by the Department to export abattoirs over the past decade. The approved plan was therefore to actually adopt Option 4 (a Government-Multiple Assignees combined service) as the implementation model, reserving the right to “take over” the service if Option 4 did not prove to be successful. The intent of the Department could be misunderstood, creating uncertainty amongst service providers moving forward.
10. The implementation of phase 2 of the plan provides for the appointment of assignees, for the Department to supervise the service at high throughput and frequently slaughtering low throughput abattoirs and with the Department providing the service at rural and infrequently slaughtering low throughput abattoirs. The following comments and points for clarification:
  - a. The appointment of assignees to structure the provision of meat inspection service provides for independence and remains the most important aspect of this phase;
  - b. The Forum agrees that a meat examiner (a spotter in a poultry abattoir or the harvester for game) may possibly be in the employment of the owner, but that this service must always be rendered under the supervision of an assignee i.e. the meat inspector at a poultry abattoir, a game depot or a game abattoir would be employed by an assignee;
  - c. The Department would only incur major costs if insisting upon Departmental supervision (phase 3) without any role in functional meat inspection. The additional Departmental supervision would be superfluous if the supervision by provincial inspectors were

improved (as envisaged in the plan) and given the improved mechanisms for contracts set by the intended meat inspection scheme, including the intended meat inspection forum; and

- d. With regards to the services of an assignee:
- i. Separation of Meat Inspection and Meat Classification services which both have to be provided independently, would increase the cost to the Industry and could be ill afforded. The recommendation for Meat Classification to be provided after Meat Inspection is impractical, but to have a dedicated person for abattoirs slaughtering more than 150 units is acceptable.
  - ii. An abattoir owner must always have a choice of assignees although the arrangement to change between assignees must be regulated to avoid bias.
  - iii. Provision was made for veterinarians as part of the service and the Red Meat Industry would maintain that veterinarians must be appointed by the assignees. The provision for an “on call” veterinarian only at high throughput abattoirs might not meet certification requirements and therefore the Red Meat Industry would like to request a review of the “on call” provision.
11. Reference is made to an alternative method of collection and payment of fees as a pre-requisite for independence. No method was however proposed as part of the approved implementation plan. Some consideration could however be given to the waiving of this requirement since the measures provided in the draft meat inspection scheme (including the meat inspection forum) might not make this alternative method of collection necessary to ensure independence. Alternatively other collection methods including a legal structure of the meat inspection forum or the current Meat Statutory Measure Services (MSMS) structure that has been accepted by the Minister since the 1st Red Meat Statutory Measures period may be considered. This requirement may not waive the obligation of an assignee NOT to receive any remuneration from an abattoir other than for meat inspection services rendered.
12. Whilst the provision of meat inspection services at rural and infrequently slaughtering low throughput abattoirs remain a major constraint in complying with the Act and its regulations, this aspect was unfortunately only addressed in the 3<sup>rd</sup> phase of the implementation plan. Phase 3 consists of the appointment by the Department of meat inspectors to supervise the services of assignees on a day-to-day basis and to provide the services at rural and infrequently slaughtering low throughput abattoirs with the intention that this service commences April 2017. The Forum would maintain that exemption be granted for the meat examiner to be legalized to render meat inspection service under supervision of an assignee/provincial department until such time as the Department could replace such service. This phase at the cost of the Department might not be necessary with the successful implementation of phase 2.

13. The Forum appeals to Government to coordinate efforts of various departments to address illegal slaughtering and to enforce meat safety.

Thank you for your considering our comments.

Yours sincerely,



Dave Ford

Chairman