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Comment on the Draft VPN/02/2017-08 “Cattle and Sheep registered unit for exports of animal products (split system)” and Addendum A; “Requirements for registration of farms, feedlots, abattoirs, cutting plants and cold stores for the exportation of beef from South Africa to China”

Dear Caroline

Thank you for the opportunity to comment or request clarification on this document . We appreciate the opportunity provided with this process to extent on the markets of the South African red meat industry. This document was prepared following discussion also with the Manager of the Red Meat Industry Forum , Michelle de Lange , who also requested comments from the broader industry.

Section A (PROCEDURES FOR REGISTRATION OF A VETERINARY APPROVED CATTLE AND/OR SHEEP SPLIT SYSTEM)

Subsection1 ;

Item 2& 3

Section 1.2 and 1.3 refer interchangeably to map and plan. Is this correct? **Annex A** refer to a layout plan not referred to in above sections . What is required?

Item 6

The Application for authorization A1. 6 refer to Annex M&N or the application . These two annexes consist of declarations only and not an application form

Item 8&9

The system provide for an authorized private veterinarian to be responsible for frequent supervision and monitoring visits and the implementation of control measures.

In the case of clinic or hospitals providing this service may more than one veterinarian be appointed for a specific registered unit to assume this responsibility?

Section B (MINIMUM STANDARDS FOR A VETERINARY APPROVED CATTLE AND/OR SHEEP FARM AND/OR FEEDLOT FOR EXPORT OF ANIMAL PRODUCTS) ;**Item 4.2**

Is the requirement for this sampling program in addition to the National program and if so are guidelines for sampling frequency available?

We note that Annex B ,Veterinary inspection report does not include register/records or reports with reference to this sampling program ? Is this correct?

Item 4.4

Refer to requirement A1.5.3. Does the restriction of B 4.4 allow for selfmixing if the premix is registered although other ingredients may not be?

Item 8.2

The reference to welfare does not include the SANS transport code 1488:2014 - Humane transportation of Livestock by Road.

Item 9. 1.7

Supervision and monitoring refer to the availability of a veterinarian for all sick livestock . Is this the intention? It is accepted that all veterinary aspects should take place under indirect supervision and monitoring by the veterinarian as provided in section 9.2. Every Cases of bloat as example , is not seen by the veterinarian.

Item 11.5.1

The addendum item 10.3 (abattoir must only slaughter cattle..) and the VPN 11.5.1 (each animal arriving at the abattoir must be in compliance.....) suggest that no other species or livestock or product may be slaughtered , cut or packed at this facility. This is more stringent than article 7 (1,2&3) of the sanitary protocol whereby contact is prohibited . On the pre-condition that management systems are in place to prevent cross contamination or time separation between different lines may this not be allowed?

Annex A

Section 1.1 makes provision for the signature by the applicant , state veterinarian responsible for supervision and the authorized private veterinarian on Annex A . Annex A does not make provision for the signature of the SV or APV.

Section A1 exclude requirements such as the registered Animal identification mark and SOP for daily inspection.

In Annex A reference is made to an approved export establishment and not a registered unit.

How can the ZA registration nr be provided by the owner? The VPN 02 does not cross reference to VPN 01 for the purpose of registering a farm /feedlot for export purposes? It should read ZA or registration number ?

Is workers the correct reference? (employees?)

The VPN refer to a manager without the particulars of the manager being required in the annex.

If a farm is leased for example, who's details will be required in the application?

In the declaration by the owner reference is made to flock.

The reference to 'or allow such agents to be administrated ' is a duplication of the earlier part of this sentence.

Annex E

The movement permit for livestock transportation is also referenced as Certificate of Origin . This is not defined in this way or referred to in combination in the rest of the document .

Should it not read intended destination instead of proposed?

Section II should rather be I and vica versa

Should read sheep **or** cattle (cannot be transported simultaneously).

A single asterix is provided at signature date but double asterix underneath in the footnote. This should read SV or APV.

The owner should not appear in section III.

In the attestation IV provision is not made to APV. How can the Veterinarian referred to in III sign the attestation by receiving authorized person?

Annex F

The Health Attestation (Annex F) or the requirements prescribed in this document is not referred to in the VPN (section 7)

Item 7.2.1 refers to a movement permit template found in the relevant addendum. Is the Movement Permit not generic to the VPN and the Health Attestation template not found in the relevant addendum?

Annex M

Annex M make no provision for the SAVC registration number as proof of competency.

Reference in this declaration is to an appointed private veterinarian and not to authorized private veterinarian as per definition. Stable manager is not applicable as at the signature point.

Point 4 refer to a quarantine station and not registered unit.

Annex N

Annex N dealing with independence does not restrict such information to aspects that may have an influence on the independence? - This is not normally the case for such a declaration.

Annex N also make no provision for the SAVC registration number as proof of competency and compared to Annex M does not provide for signature point for the Department.

Application template

The VPN section on application for authorization (A1. 1.6 -1.9) makes no provision for a template for application , recognition of receipt of application or a template/ section for recommendation (province) or approval on the document. In view of the timelines and annual reregistration the VPN should guide the timeous flow of information for an enabling environment.

References to Annexes

With the exception of Annex A,B, E, M and N , no reference is made to the other Annexes provided as an example? What is the reason for this?

General

In the introduction reference is made to the responsibility for cost in the establishment and maintenance of a split system. Could the statement be expanded to clarify the nature of the cost referred to and the role of the department in this cost.

Please do not hesitate to contact me should you have any enquiries.

Regards

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