



29 June 2017

Dr Mpho Maja
Director of Animal Health
Directorate of Animal Health
Department of Agriculture, Forestry and Fisheries

CarolineG@daff.gov.za, ElmarieV@daff.gov.za

Dear Caroline and Elmarie,

VPN/02/2017-08, "Cattle and Sheep registered unit for exports of animal products (split system)" dated 19 May 2017 refers.

Thank you for granting me an extension on the deadline to make a contribution. Herewith my comments and/or questions posed for clarity prepared in close collaboration with Dr Gerhard Neethling of the Red Meat Abattoir Association.

TABLE OF CONTENTS:

1. Annex D was omitted from the Table of Contents.

ABBREVIATIONS:

2. Why supply the abbreviation for Animal Health Technician if AHT is never used in the VPN?
3. What is the difference between a State Veterinarian and an Official Veterinarian? Does Official Veterinarian refer to an Authorized Private Veterinarian?

DEFINITIONS:

4. Are there a Health Certificate and a Health Certificate for Movement?
5. How does the Movement Permit differ from a Red Cross Permit?
6. In terms of which legislative framework is the Movement Permit issued?
7. Would a cutting plant and cold store not be regarded a registered unit per definition?



Red Meat Industry Forum | manager@rmif.co.za | 392 Church Ave, Lynnwood, 0081 | www.redmeatsa.co.za | Tel: +27 79 162 6465

Members: Mr D Ford (Chairman), Mr T Davidson (Vice-Chairman), Mr G Schutte, Mr G Southey, Ms E van Reenen, Mr A Cocks, Mr A Mahanjana, Dr P Prinsloo, Mr K Louw, Ms T Rudman, Mr D Osborne, Mr F Kok, Mr A Vos, Ms M de Lange (General Manager)

8. Should the definition for *Responsible Person* not be expanded to include day-2-day decision makers; principle farmer, farm/feedlot operator, manager of registered unit, lessor, lessee...
9. In terms of which legislation is the private veterinarian authorised to perform specified duties?
10. Why define registered farm and registered feedlot, but not define registered abattoir, registered cutting plant or registered cold store?
11. The definition for inspection refers to “organic food”, yet “organic food” is not defined.

BACKGROUND:

12. In the background a statement is made that all costs to establish and maintain a split system was to be paid by the exporter or benefactor. Could the statement be expanded to clarify the nature of the cost referred to and the role of the department therein?

A. PROCEDURES FOR REGISTRATION OF A VETERINARY APPROVED CATTLE AND/OR SHEEP SPLIT SYSTEM

1. REGISTRATION OF A VETERINARY APPROVED CATTLE AND/OR SHEEP FARM AND/OR FEEDLOT

13. Would there be a cost to apply to register or re-register a veterinary approved cattle and/or sheep registered unit for export?
14. According to 1.1 it is mandatory for the authorised private veterinarian and the state veterinarian responsible for supervision and certification of the registered unit to sign Annex A, yet there is not provision on the Application Form (Annex A) for the vets to sign.
15. According to 1.2 and 1.3 an aerial map and detailed site plan should accompany the application form, yet Annex A lists a layout plan.
 - a. Is there a difference between a detailed site plan and a layout plan i.e. is an aerial map, detailed site plan and layout plan required?
 - b. And would it not be less confusing listing all supporting documents in chapter 1 instead of on Annex A?
 - c. Does endorsement of the aerial map and detailed site plan mean that the state veterinarian or the authorised private veterinarian has to sign off on the map and plan?
16. It is suggested that 1.4 is separated into General veterinary inspection report and Country specific veterinary inspection report for the sake of clarity.
17. Chapter 1 lists the documents that must be presented to DAFF on application for registration, yet 1.5 does not list documents, but rather duties of the authorised private veterinarian.



It is suggested that relevant documents that need to be presented be listed here. Perhaps this is the appropriate section in the VPN to reference Annex G-K or is the latest official inspection report the only document required; since Annex B states that registers/records should only be available.

18. Is there an application form to be used when the private veterinarian applies for authorisation to the provincial state veterinarian, as no application form was included as an Annex?
19. Does the application for authorisation of the private veterinarian happen simultaneous to the application for certification of a registered unit for export? Or, does the one precede the other in which case the relevant document to list in Chapter one as part of the documents supporting an application for certification of a registered unit should be a letter of authorisation of the private veterinarian signed by the relevant directorate.
20. It is not clear how the Provincial State Veterinarian would acknowledge receipt of an application to authorise a private veterinarian or how the process would be administered in terms of submitting a recommendation to the Director of Animal Health. Could you provide clarity on the flow of information and the timelines providing guidance to an applicant?
21. It is proposed that 1.5 to 1.9 be written into a separate chapter with the heading: "AUTHORIZATION OF THE PRIVATE VETERINARIAN".
22. In the case of a veterinary clinic being appointed by the registered unit, may a number of private veterinarians be authorised to service the same registered unit?

2. ANNUAL RE-REGISTRATION

23. According to 2.4 re-registration would not be immediate; therefore, it is reiterated that it is crucial for the applicant to have clarity on the time frame to administer the re-registration process.

B. MINIMUM STANDARDS FOR A VETERINARY APPROVED CATTLE AND/OR SHEEP FARM AND/OR FEEDLOT FOR EXPORT OF ANIMAL PRODUCTS

4. FEED

24. According to 4.3 the documentation described in 4.2 should support the application for registration or re-registration – yet this documentation is not listed as such in the list of documents included in Chapter 1. Perhaps a template could be included as Annexure, similar to Annex G-K.

7. MOVEMENT OF ANIMALS

25. Reference is made in 7.2.1 to a movement permit contained in the country specific addendum, is it not a health attestation that is country specific?



9. SUPERVISION AND MONITORING

26. Reference is made in 9.1.7 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 direct supervision and monitoring by the veterinarian as provided in section 9.2 i.e. every case of bloat for example is not seen by the veterinarian.

10. RECORDS REQUIRED FOR INSPECTIONS

27. Chapter 10 feels like a duplication of Chapter 1 and it is suggested that the two chapters be condensed into one chapter.

11. REGISTRATION AND INSPECTION OF EXPORT ABATTOIRS AND CUTTING PLANTS

28. Reference is made in 11.5.1 to “each” animal having to be compliant to the VPN and suggests that no other species or livestock may be slaughtered, cut, processed or packed at the registered unit. This seems more stringent than article 7 of the sanitary protocol were contact is prohibited. On the precondition that management systems are in place to prevent cross contamination or time separation between different lines, may this not be allowed?

ANNEX A

APPLICATION FORM

- 29. Should “export establishments” not be defined to include registered abattoirs, registered cutting plants, registered cold stores?
- 30. Responsible person is defined, yet the Application form only refers to the owner. Should owner and/or responsible person not be included?
- 31. In the case where the applicant applies for re-registration, should the 1st Registration Date and/or the Expiry Date of the current registration certificate not be included on the application form to ease recording on the database?
- 32. Reference is made to “paragraph 12-18” in the declaration included in the application form (ix), but it is unclear which paragraphs are referred to?
- 33. Reference is made to “standards” in the declaration included in the application form (x), but it is unclear which standards are referred to?

ANNEX B

VETERINARY INSPECTION CHECKLIST AND/OR VETERINARY INSPECTION REPORT

34. Which registers/records/reports should be available to provide assurances that feed does not contain ingredients of ruminant origin or prohibited medications or feed additives?



35. Is the chemical risk sufficiently addressed by the questions posed in the application form, or is there a register/record/report that should be included to provide the necessary assurances?
36. Reference is made to “standards” in the declaration included in the veterinary inspection report, but it is unclear which standards are referred to?

**ANNEX C
REGISTRATION CERTIFICATE...**

37. Reference is made to “standard” in the certificate, yet it is unclear which standard is referred to.

**ANNEX M
IMPARTIALITY AND CONFIDENTIALITY DECLARATION**

38. There is no provision for the SAVC registration number of the private veterinarian as proof of competency.

**ANNEX N
DECLARATION OF INDEPENDENCE**

39. There is no provision for the SAVC registration number of the private veterinarian as proof of competency.
40. The declaration does not restrict information required to aspects that could influence independence relevant to performing duties in terms of the VPN.

Thank you for your kind consideration of this input on behalf of the Red Meat Industry.

Kind regards,



General Manager
Red Meat Industry Forum