



# agriculture, forestry & fisheries

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Department:  
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## **DRAFT SANITARY AND PHYTOSANITARY STRATEGY January 2014**

**DIRECTORATE: FOOD IMPORT AND EXPORT STANDARDS**

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## 1. INTRODUCTION

Globalization coupled with increased trade in agricultural commodities presents both opportunities and risks. On the one hand, exports of agricultural commodities generates much needed foreign revenue and on the other, it presents new pathways for the introduction and spread of pests and diseases that can have a profound effect on agricultural production with potentially dire economic consequences. Exploitation of global market opportunities for agricultural and food products is subject to compliance with international standards, such as sanitary and phytosanitary (SPS) measures that aims to provide the required protection against risks that may threaten human, animal and plant health and life.

SPS measures are mandatory requirements adopted by countries to protect the health and lives of humans, animals and plants from risks associated with diseases, pests and contamination of foodstuffs, and to prevent damage caused by the establishment or spread of pests and diseases. The application of SPS measures within the global trade environment is governed by the World Trade Organisation's Agreement on Sanitary and Phytosanitary Measures (WTO SPS Agreement). Whilst the WTO SPS Agreement affords member countries the right to apply SPS measures to provide for an appropriate level of protection (ALOP) for the life and health of humans, animals and plants, it also determines that such measures should be scientifically justified, non discriminatory and should not create unfair barriers to trade.

The significance of South Africa's (SA) participation in the global economy is reflected in the increasing economic value associated with exports of agricultural commodities such as fruits, animal, and fishery products. However, with market access of our agricultural commodities being increasingly under threat due to evolving SPS requirements, sustained economic growth from these exports will be dependent on how efficiently the South African SPS management system is able to respond to and ensure compliance in meeting its SPS obligations and responsibilities in the interest of promoting fair and safe trade. SPS issues continue to also have an impact at a national level. This is evident from the increasing costs incurred by government and producers for mitigation of pest introductions and recurring disease outbreaks such as Foot and Mouth disease (FMD) that result in substantial loss of

earnings each year and negatively impacts rural communities that depend on agricultural production for their livelihood. For example the 2010 outbreak of FMD has been estimated to have cost the country R4 billion in export losses. While SA is self-sufficient in some key agricultural commodities and food products, it still relies on global imports to address shortages in the food supply. The need to import brings along with it SPS risks from exporting countries. Furthermore as an internationally recognised tourism destination, international travellers to SA constitute an additional pathway for the entry of exotic organisms into the country. Therefore SPS risks presented through imports and tourism requires strengthened management of potential SPS risks, particularly at the ports of entry.

There is currently no overarching framework that provides for management of SPS issues in a holistic, comprehensive and coordinated manner. This strategy therefore aims to provide an integrated approach to mobilise SA's SPS management capacity in support of complying with its international SPS commitments under the WTO and to meet SPS market requirements for agricultural and food commodities in support of national and international trade and development objectives. Considering the multidisciplinary nature of SPS issues and the range of institutional responsibilities carried out by various role-players, this strategy document will firstly, focus on the status of SA's SPS management capacity specifically highlighting some of the challenges impacting its ability to meet its international obligations and secondly, identify key areas within the SPS system that needs to be addressed and propose interventions that would facilitate an efficient, proactive and integrated response to emerging SPS risks going forward.

## **2. STRATEGIC GOAL OF THE SPS STRATEGY**

The goal of the SPS strategy is to provide for an overarching national framework that aims to enhance and strengthen the ability of SA to satisfy its obligations in terms of the WTO SPS Agreement, to provide adequate protection against risks threatening human, animal, plant life and health and to enhance SA's competitiveness to fully benefit from market access opportunities.

### **3. OBJECTIVES**

To achieve a robust and responsive SPS management system as envisioned by the Strategy the focus areas for implementation will be to:

- Promote SPS legislative reform that is harmonised with international requirements and facilitates animal health, plant health, and food safety through the application of science based SPS measures that are applied to all levels of policy, planning, and decision making;
- Enhance integration between and amongst relevant SPS implementing agencies at National, Provincial, and Local government with clear roles and responsibilities;
- Strengthen and integrate SPS management capacity to facilitate improved compliance in terms of SPS obligations of relevant international agreements and bodies;
- Promote stakeholder engagement and support along the value chain by building and establishing partnerships that recognise SPS as a shared responsibility;
- Improve the level of SPS communication and awareness within government as well as amongst relevant stakeholder groups;
- Exploit opportunities to strengthen SPS capacity and skills that will have maximum impact on SPS compliance for safe and responsible domestic and international trade of agricultural and food products; and
- Enhance SPS diplomacy through active participation in bilateral, multilateral and negotiating fora and SPS coordination mechanisms.

### **4. SCOPE OF THE STRATEGY**

Considering the extensive scope of SPS matters, the focus of the strategy will be to reconcile SPS management capacity with appropriate implementation strategies to build and develop the efficiency with which the SPS management system is able to appropriately respond to all significant SPS risks threatening agriculture, forestry, horticulture, fisheries, native biodiversity, and human health. For purposes of this strategy all terminology related to SPS matters are as defined within the scope of the WTO SPS Agreement and recognised international standard setting bodies for plant health, food safety and animal

health. The strategy excludes issues relating to the protection of private market requirements (i.e. private standards), animal welfare and the framework for managing genetically modified organisms (GMO), except where scientific evidence determines that GMO's approved in SA should be classified as an SPS risk.

## **5. INTERNATIONAL SPS POLICY CONTEXT: The World Trade Organisation's Agreement on the Application of Sanitary and Phytosanitary Measures (WTO SPS Agreement)**

The WTO SPS Agreement establishes international rules for the application of SPS measures in international trade of food and agricultural products. The Agreement explicitly recognizes the right of countries to apply SPS measures to provide an ALOP for the life and health of humans, animals and plants, provided that such measures can be justified scientifically, are non discriminatory and do not create unfair barriers to trade. SPS measures are defined within the WTO SPS Agreement as any measure applied:

- to protect animal or plant life or health from risks arising from the entry, establishment or spread of pests, diseases, disease-carrying organisms or disease-causing organisms;
- to protect human or animal life or health from risks arising from additives, contaminants, toxins or disease-causing organism in foods, beverages or feedstuffs;
- to protect human life or health from risks arising from diseases carried by animals, plants or products thereof, or from entry, establishment or spread of pests; or
- to prevent or limit other damage from the entry, establishment or spread of pests.

The WTO SPS Agreement is underpinned by several key elements to ensure that its objectives are achieved. These are briefly described as follows:

### **5.1 Harmonization**

The WTO SPS Agreement calls for countries to base their SPS measures on international standards, guidelines, and recommendations developed by international standard setting organizations. The objective in promoting the use of international standards is to facilitate trade by harmonizing SPS measures of different countries on as wide a basis as possible.

Countries are permitted to adopt measures that achieve a higher level of protection, provided that it can be scientifically justified.

To support the objectives of international harmonisation the SPS Agreement specifically recognises the following international standard setting bodies (ISSBs):

- **Codex Alimentarius Commission (Codex):** addresses standards for food and food safety;
- **World Organisation for Animal Health /Office International des Epizooties (OIE):** addresses standards relating to animal health including animal disease control for the safe and fair trade of animals and animal products; and
- **International Plant Protection Convention (IPPC):** addresses phytosanitary matters to prevent the introduction, spread and establishment of plant pests and to promote appropriate measures for their control for safe and fair trade of plants and plant products.

## **5.2 Risk assessment and determination of the appropriate level of protection**

The WTO SPS Agreement requires that scientific evidence is provided when applying SPS measures that differ from international standards. This scientific evidence should be based on a risk assessment, taking into account where appropriate, risk assessment methodologies developed by international standard setting organisations. Furthermore the application of SPS measures should be consistent; to avoid arbitrary or unjustifiable distinctions in the levels of protection considered appropriate where such distinctions unnecessarily impede trade. In cases where relevant scientific evidence is insufficient, SPS measures may provisionally be adopted on the basis of available information. However, additional evidence must be obtained and the SPS measure reviewed within a reasonable period of time.



### **5.3 Equivalence**

The WTO SPS Agreement requires member countries to accept the SPS measures of other countries as equivalent where they can demonstrate that the measures achieve the same level of protection.

### **5.4 Adaptation to regional conditions, including pest or disease free areas and areas of low pest or disease prevalence**

The WTO SPS Agreement recognises that SPS risks do not correspond to national boundaries and that there may be areas within a particular country that have lower risks than others. As a result provision is made for the recognition of pest or disease free areas within countries as determined by a defined set of objective criteria.

### **5.5 Transparency**

The WTO SPS Agreement establishes procedures for enhanced transparency by requiring that all proposed and implemented SPS measures are notified to the WTO SPS secretariat. These SPS notifications are in turn relayed to member countries via their Notification Authority. Members are also required to maintain an enquiry point which is the direct point of contact for any information or documents relating to the notification of SPS measures.

### **5.6 Consultation and Dispute Settlement**

The WTO SPS Agreement establishes structured procedures for the settlement of disputes between members regarding the legitimacy of SPS measures that distort trade. This takes the form of a dispute settlement body consisting of member country representatives.

The WTO SPS Agreement makes provision for the establishment of a Committee on Sanitary and Phytosanitary Measures (SPS Committee) to provide a regular forum for consultations on SPS measures affecting trade and to oversee the implementation of the WTO SPS Agreement. The WTO SPS Committee meets triennially and meeting discussions routinely addresses issues relating to implementation of the WTO SPS

Agreement, monitoring harmonization of national measures with international norms, the development of standards by international standard-setting organizations, requirements for technical assistance and concerns regarding the potential impact of new SPS measures on trade. Participation at WTO SPS Committee meetings is open to all WTO Members countries as well as ISSB's and recognised observer organisations.

### **5.7 Control, Inspection and Approval Procedures**

The WTO SPS Agreement establishes procedures for the operation of control, inspection and approval procedures to ensure that they are aligned to the provisions of the Agreement, are reasonable and necessary, and are undertaken in a no less favourable manner for imported products than for like domestic products.

### **5.8 Technical assistance**

The WTO recognises that the technical capacity to implement the WTO SPS Agreement varies between WTO members and that developing country Members in particular, require technical assistance to be able to meet their obligations and enforce their rights under the Agreement. The WTO SPS Agreement therefore encourages all Members to facilitate technical assistance to developing country Members either bilaterally or through relevant international organisations such as the OIE, IPPC, CODEX, WTO etc.

## **6. CURRENT STATUS OF SPS MANAGEMENT CAPACITY IN SOUTH AFRICA**

Due to globalisation, there has been an increase in international integration within the trade, capital and labour markets. As a nation, SA, relies on trade and travel, therefore robust SPS measures are fundamental to SA's future prosperity and well-being. SPS measures are therefore meant to safeguard the health and safety of SA's consumers and to protect production and natural resources from risks affecting plant and animal life or health. Ensuring that the application of SPS measures is consistent with SA's obligations under the WTO SPS agreement, the SPS management system requires adequate support in terms of legislative frameworks, institutional capacity, human and financial resources, infrastructure (laboratories, quarantine facilities), systems (inspection and certifications systems) etc. The

sections that follow will serve to provide an overview of SA's existing SPS management capacity in relation to these key elements.

## **6.1 SPS REGULATORY FRAMEWORK**

South Africa's SPS management capacity is supported by an extensive regulatory framework with principle legislation in the disciplines of plant health, animal health and food safety supported by subordinate regulations, policies, strategies and relevant norms and standards (see Table 1 below). Within the Department of Agriculture, Forestry and Fisheries (DAFF) several pieces of SPS legislations are currently subjected to a process of legislative review in order to ensure coherence with other relevant legislation including the constitutional framework, benchmarking with international standards, improving technical justification and the efficiency of administrative processes.

In addition to SPS legislation, relevant technical components within the DAFF are in the final stage of developing policy frameworks for food safety, animal health and plant health. The draft Plant Health (Phytosanitary) Policy seeks to address the gaps and challenges in the current phytosanitary system in view of the requirements of SA's major trading partners and obligations under the relevant international agreements and treaties to which SA is a signatory member. The draft Food Safety Policy seeks to fulfil the obligation of government to achieve what the Constitution of the Republic has mandated the DAFF in terms of section 27, which in part reads "access to sufficient food", which implies safe and sufficient food. The draft National Veterinary Strategy seeks to provide direction for the development of veterinary policy objectives that promote improvement in the delivery of veterinary services benchmarked against international norms and standards.

Table 1: List of applicable SPS legislation

Act	Act No. and year Promulgated	Administering dept/ agency	Directorate/ Cluster	Enforced	Summary
Agricultural Pests Act	Act No. 36 of 1983	DAFF	DPH	National	Provide for measures by which agricultural may be prevented and combated
Agricultural Products Standards Act	Act No. 119 of 1990	DAFF	FSQA	National/ PPECB	Provides control over the sale and export of certain agricultural products.
Animal Diseases Act	Act No. 35 of 1984	DAFF	DAH	National	Provides for the control of animal diseases and parasites and provides measures for the promotion of animal health.
Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act	Act No. 36 of 1947	DAFF	DAIC	National	Provides for the registration of fertilizers, farm feeds, agricultural remedies, sterilising olants and pest control operators among others.
Foodstuff, Cosmetics and Disinfectants Act	Act No. 54 of 1972	DoH	Food Control	Provincial/ Local	Control the sale, manufacture and importation and exportation of food stuffs, cosmetics and Disinfectants.
Liquor Products Act	Act No. 60 of 1989	DAFF	FSQA	National	Provides for the control over the sale of certain alcoholic products.
Meat Safety Act	Act No. 40 of 2000	DAFF	Veterinary Public Health	National	Provides for measures to promote meat safety and the safety of animal products.

Medicines and Related Substances Act	Act No. 101 of 1965	DoH	Medicines Regulatory Affairs	National	Provides for the registration of medicines intended for human and for animal use.
National Regulator for Compulsory Specifications Act	Act No. 5 of 2008	Dti	NRCS	National	Provides for the existence of the NRCS, which is responsible for Compulsory standards regarding certain forms of meat and fish .

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## 6.2 INSTITUTIONAL ARRANGEMENTS

The DAFF, as the custodian of the WTO SPS agreement, is the leading authority responsible for SPS issues, together with the Department of Health (DoH) and the National Regulator for Compulsory Specifications (NRCS).

The branch for Agricultural Production, Health and Food Safety (APHFS) within DAFF is responsible for administering the SPS legislative mandate and the management of risks associated with animal diseases and plant pests, ensuring compliance to relevant regulatory frameworks, promoting food safety and creating an enabling environment for increased and sustainable agricultural production. In achieving its objectives, the various technical competencies within the APHFS branch are responsible for risk analysis, surveillance and maintenance of early warning and response plans, development of national SPS standards, monitoring compliance to national legislation and SPS requirements of trading partners, diagnostic services, promotion and awareness, providing inspections and certification services and SPS diplomacy within the international standard setting arena and the WTO SPS Agreement. The organisational structure of the APHFS branch is outlined in Figure 1 below.

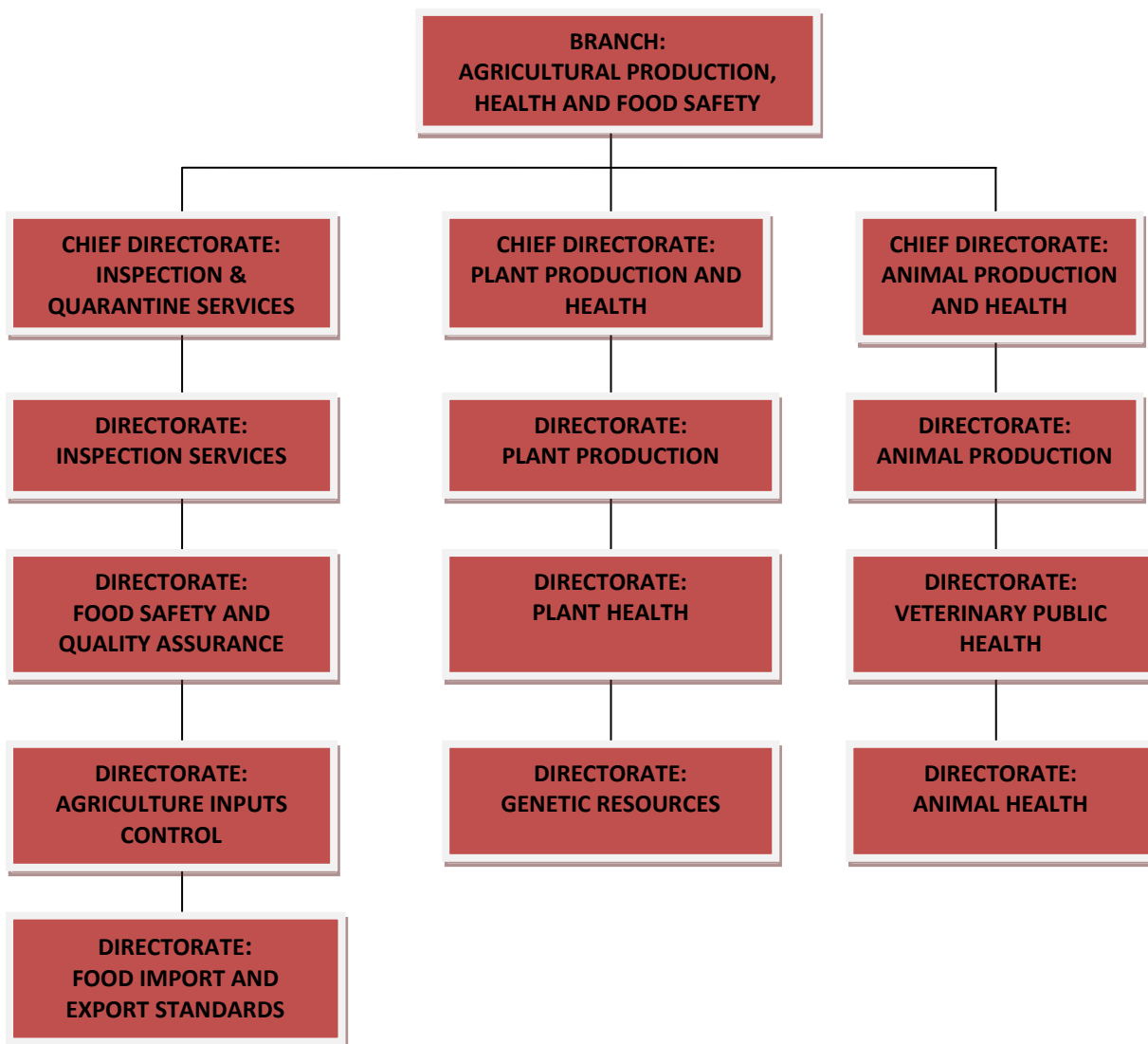


Figure 1: Organisational structure of the Agriculture Production Health and Food Safety Branch

In terms of SPS diplomacy, SA is a signatory to the WTO SPS Agreement as well as the three international standard-setting bodies (ISSBs) recognised in terms of the WTO SPS Agreement. The mandate for international engagement in terms of the Codex, the OIE and the IPPC has been delegated to the various technical competencies as follows:

- The OIE national contact point is the responsibility of the Directorate Animal Health (DAH);
- The IPPC national contact point is the responsibility of the Directorate Plant Health (DPH); and
- The Codex Alimentarius national contact point is a shared responsibility between the DoH and the Directorate Food Safety and Quality Assurance (DFSA) in DAFF.

## **6.3 IMPLEMENTATION OF THE WTO SPS AGREEMENT**

The objectives of SPS measures are twofold, firstly at the national level to protect domestic production and natural resources from hazards affecting animal and plant life or health as well as ensuring food safety for public health; and secondly to satisfy international standards of export markets. In fulfilling obligations under the SPS Agreement, SA's application of SPS measures needs to align with key principles and provisions of the Agreement in support of scientifically based decision-making for the international trade of food and agricultural products. The following sections will provide an overview of South Africa's institutional capacity to comply with some of the key guiding principles and obligations under the WTO SPS Agreement.

### **6.3.1 Assessment of SPS risks through science based approaches**

The application of science is a grounding principle for the development and application of SPS measures that employs risk analysis to effect rational decision making. South Africa's extensive SPS regulatory framework and institutional capacity, although not ideal, creates the platform for utilisation of science as the critical element underpinning the entire process of risk analysis as it applies to the management of food safety and the control of pests and diseases. The DAFF competent authorities for each of the disciplines constituting SPS, generally applies scientific justification by following a risk analysis based approach to determine the ALOP to address domestic as well as international SPS standards for trade. The application of science based risk analysis requires access to capacity in appropriate areas of expertise such as diagnostic services, surveillance, inspections, certification systems and emergency response systems etc and the extent to which capacity is deployed in these areas is demonstrated through various examples provided.

#### *A] Monitoring and surveillance*

Surveillance underpins the process of Risk Analysis as the information and data collected from surveillance feeds into the final outcome - which ultimately is the basis for the scientific processes of the WTO SPS Agreement. DAFF competent authorities manage ongoing surveillance activities and in some cases have implemented programmes to address specific pests and diseases that are of critical economic importance to the agricultural

sector. This is best illustrated in the example (Box 1) involving a targeted fruit fly surveillance programme initiated in 2006 to ensure early detection of exotic fruit flies at ports of entry and in fruit producing areas in SA.

**Box 1: African Invader fruit fly, *Bactrocera invadens* in South Africa**

The African Invader fruit fly, *Bactrocera invadens* (Bi), has spread across Sub-Saharan Africa after being detected in Kenya in 2003 and currently occurs in many African countries, including the following in the south: Angola, Democratic Republic of the Congo, Malawi and Zambia, as well as the northern parts of Botswana, Mozambique, Namibia and Zimbabwe. *Bactrocera invadens* has become a major pest of economic and quarantine concern and is known to attack various host plants, including commercially grown fruits such as mango, guava, melon and citrus, wild indigenous fruits such as marula and wild figs, as well as “vegetables” such as bell peppers, pumpkins and tomatoes. As a significant exporter of fruit to the European Union (EU) and other markets, South Africa in response to the threat posed by BI, proactively implemented a fruit fly surveillance programme in 2006 to ensure early detection of the pest at ports of entry and fruit producing areas. In addition an area-wide fruit fly management action plan for the region was approved by the Southern African Development Community (SADC), but was never implemented or rolled out. Subsequently pest incursions for the fruit fly, *Bactrocera invadens*, were confirmed in 2009 in the northern areas of Limpopo Province in South Africa and capacity has since been deployed for further surveillance and eradication of the pest in infected areas.

Other examples of targeted surveillance activities include responses to Foot and Mouth Disease (FMD) outbreaks in the zoned areas of northern Kwazulu Natal and along the borders of Mozambique. In the case of FMD, surveillance activities are not only critical for determination of disease infection areas to implement national control measures, but also to comply with criteria for official OIE disease recognition status so that international trade of affected commodities can resume with minimal interruption.

Based on SA experiences with the examples provide above, it is apparent that the costs of mitigation substantially increases when pests or diseases penetrate borders and become established or alternatively when outbreaks recur. Surveillance should therefore not just be reactive towards pests or disease priorities impacting current commodity or market access requirements, but instead surveillance should as part of integrated risk analysis system, strategically shift towards being proactive and significantly focus on prevention, early warning systems and eradication of emerging risks in the immediate to long term. Furthermore, addressing the inefficiencies regarding the integration and electronic management of surveillance data would go a long way to improving SA’s state of readiness to address the actualisation of any potential risks.



### *B] Diagnostic / Laboratory services*

Within the South African SPS system diagnostic and analytical laboratory services is provided in terms of various legislative mandates of the DAFF and the DoH. The scope of laboratory services includes testing related to the detection of diseases and pests as well as testing for various chemical residues, additives and microbiological contaminants. Where specialized competencies are lacking (to perform certain tests) these services are outsourced/sub-contracted to authorised testing facilities at various parastatal institutions, universities as well as in the private sector.

The increasing frequency of food safety incidences and pests and disease outbreaks, nationally and internationally, has exposed several weaknesses in SA's diagnostic and analytical laboratory capabilities. This was notably evident with ostrich exports to the EU which highlighted challenges regarding the overall residue control system and our ability to provide guarantees regarding compliance to EU residue limits. Fortunately, in this instance deficiencies in the residue testing system were corrected and SA has since been able to demonstrate that its residue control system provides guarantees that are equivalent to the requirements of the EU.

While SA official laboratory services is generally able to handle the demands of existing SPS risks, challenges persist with regard to adequate infrastructure and suitable instrumentation, access to the latest scientific technology and protocols, upgrading technical competencies for specialized testing services, standardisation and validation of testing through reference laboratories and appropriate reference collections and the aggregation of testing data through an integrated electronic data management system in certain areas.

### *C] Inspections*

The SPS legislative mandate provides for designated inspection capacity at SA's ports of entry to manage risks associated with pests and disease entry as well as to provide export certification of agricultural products in compliance with national SPS regulations and/ or international standards.

While border inspections are targeted at regulating the risks of imported consignments and unintended imports of commercial and passenger cargo, the border control environment is a complex one that requires close cooperation with other government agencies such as the SA Police Services (SAPS) and SA Revenue Services (SARS). In this regard cooperation is managed through the establishment of the Border Control Operational Coordinating Committee (BCOCC) thus providing a strategic management and coordination platform through which Inspections Services can engage on SPS issues of concern within the border environment. In some cases inspection services is decentralised through legislative delegation of inspections to provincial and local government authorities as well as to external assignees. Challenges emanating from these delegated activities are rooted within the fragmentation of the SPS system and revolve around issues of standardisation and auditing of external inspections systems, maintaining an acceptable level of technical competency and overall awareness of SPS standards.

Despite risk mitigation at various ports of entry, the propensity for SPS related risks' being introduced into South Africa still remains high. The situation is further aggravated by the demarcation of borders beyond just the point of entry and exit to also include inland extended detention points of entry, which present alternative pathways for introduction of risks. Apart from the obvious capacity and resource challenges, rationalised deployment of inspection capacity across the various government agencies and assignees necessitates closer cooperation and prioritisation of activities to extend the reach and coverage of inspections services to improve both enforcement of local SPS standards and compliance with the requirements of export markets.

### **6.3.2 Harmonization with international standards**

Harmonisation with international standards is defined as basing national regulatory requirements on standards developed by the three recognised international standard setting bodies (OIE, Codex and IPPC) where such SPS standards exist. Where applicable, SA SPS requirements are benchmarked against international standards but more can be done to demonstrate transparency in this regard. Difficulties with harmonisation emerge when trading partners choose to adopt stricter standards that achieve a higher level of protection such that market access compliance becomes onerous and costly. Exercising SA's right to challenge these stricter requirements is often plagued by undue delays in

processes and specific capacity and resource constraints. This is best demonstrated by SA's longstanding bilateral engagement on the EU's implementation of measures for Citrus Black Spot (CBS) affecting SA's citrus exports to the EU (Box 2 below).

**Box 2: Citrus Black Spot**

As far back as 1992, SA informed the European Union (EU) that it considered the proposed legislation pertaining to CBS import measures for fresh Citrus fruit to be excessively restrictive. Since approximately 40% of South Africa's citrus fruit is exported to the EU, the stringent phytosanitary import measures for CBS has a negatively affected SA's Citrus Industry, which plays a significantly important role in the rural economy of South Africa. Apart from ongoing technical dialogue with the EU on the CBS import measure, SA has also participated in visits from the European Union Food and Veterinary Office (EU FVO) in 1998, 2007, 2009, 2011 and 2012, which resulted in further strengthening of the CBS risk management system to address specific areas of concern and improve compliance. With due consideration to the EFSA risk assessment report on CBS published in 2009, the EU FVO visits to South Africa, and the inconclusive 10-year exchange of scientific information, SA decided to take the process forward through the available international channels. Accordingly, in 2010 the IPPC was approached to intervene through the technical dispute settlement procedure which is currently still ongoing.

To avoid being categorised as a "standard taker" SA's participation at international standard setting bodies of the IPPC, Codex and OIE and the WTO SPS Committee is crucial. In this regard the relevant technical competent authorities regularly participate in committee meetings; however cost considerations sometimes outweigh the need for a well supported negotiating team adequately equipped with relevant expertise. By implication, SA's ability to influence the outcome of international standard setting so that standards are amenable to local agricultural production practises and marketing systems is often met with challenges. To realise the potential benefits from the harmonisation of standards, SA will need to make the necessary investments to improve alignment between national SPS measures and international SPS standards thus improving domestic public health and food safety and simultaneously enhancing market access potential to expand to alternative markets.

### **6.3.3 Mutual recognition of equivalence**

Recognition of SPS equivalence within the international trade environment continues to be a contentious issue and while considered an enabling instrument for trade in theory, is often very difficult to apply in practice. SA acknowledges that the application of equivalence to recognise alternative SPS approaches to achieve the same level of protection could have potential advantages if SA is able to adequately demonstrate that its domestic SPS measures are equivalent to the requirements of its trading partners. To date SA has not

entered into any formal equivalence agreements with its trading partners, however, acceptance of equivalence is mostly tacit and is commonly directed at specific technical aspects or certification processes for specific products. Similarly to compliance with other provisions of the SPS agreement, for the benefits of equivalence to be realized considerable investment will be needed in upgrading capacity along the entire SPS value chain together with a collective concerted effort from all relevant private and public sector role players.

#### **6.3.4 Adapting to regional conditions, including the establishment of pest or disease free areas and areas of low pest prevalence**

Many SPS concerns like the occurrence of pests, animal and plant diseases do not follow national borders nor adhere to the established practise of national legislation defining SPS measures along national lines. Taking this into account, the SPS agreement recognises that areas within a particular country may have varying levels of risk or no risk at all and international standard setting bodies have developed standards and /or international guidelines to give effect to this provision. Despite international backing for this issue, there has still been some reluctance from trading partners to accept this approach. The application of pest or disease free zones is widely applied by the various SPS competent authorities in SA. In the case of meat exports, the principle of disease zoning has been applied to address recurring outbreaks of Foot and Mouth Disease (FMD) in the country, thus facilitating continued exports of animal products from zones that are classified FMD free. In the case of horticultural exports, the application of pest free areas for *Guignardia citricarpa* (Citrus Black Spot) and Citrus Greening have been successfully maintained in support of continued exports of citrus. For SA to further exploit opportunities for market access, resources would need to be directed at investigating opportunities for the establishment of additional pest/ disease free areas related to prioritized commodities, promoting collaboration with research institutions (public and private) to overcome scientific capacity challenges and instituting appropriate legislative reforms to address movement control for movement of products between infected areas and recognised disease or pest free areas. SA also acknowledges that the provision of regionalisation also presents opportunities for harmonisation of SPS measures on a regional basis and for the promotion

of intra-regional trade. In this regard SPS initiatives towards regional harmonisation of SPS standards should play a key role.

### **6.3.5 Transparency**

To give effect to its transparency obligations, SA has maintained an official SPS National Notification Authority (NNA) and National Enquiry Point (NEP), through its Directorate: International Trade in the DAFF. This institutional arrangement has not been ideal as judged from the total of only thirty seven notifications being submitted to the WTO SPS secretariat to date and the inability to monitor and adequately respond to notifications of trading partners regarding changes in their SPS requirements.

Recognising that SA has been underperforming with regard to its transparency obligations, a decision has been taken to relocate the NNA and NEP to the SPS technical branch within DAFF. The intention is to appropriately capacitate the NNA and NEP to fully implement the notification mechanism, improve transparency by encouraging the notification of measures that conform to international standards amongst the different implementing agencies, improve monitoring and inputs to notifications of SPS measures that directly affect SA's market access and to facilitate coordination and awareness of SPS issues through national coordination mechanisms such as the National SPS / TBT Committee.

### **6.3.6 Dispute settlement**

While SA has not formally pursued the dispute settlement mechanism it has on several occasions expressed concerns regarding SPS measures by tabling trade concerns in the WTO SPS committee meetings when bilateral engagements with Member countries have failed to achieve a resolution. Trade concerns raised within the WTO SPS meeting platform have included issues relating to import requirements for animal diseases and phytosanitary measures for horticultural exports. Similarly, SPS measures maintained by SA have also been challenged through trade concerns lodged by other member states, such as Brazil which challenged SA's import restrictions for fresh pork meat in 2011. Any future decision to challenge an SPS measure through the WTO SPS formal dispute settlement mechanism process will require sanction at the highest levels of government and will require good

collaboration amongst the various stakeholders, access to legal expertise and advice, appropriate technical expertise and adequate justification in terms of science and economic impact of the SPS measure being maintained.

#### **6.4 PARTICIPATION IN REGIONAL SPS COORDINATION MECHANISMS**

Regional economic communities (RECs), such as the Southern African Development Community (SADC), have mobilized efforts towards the establishment of regional SPS coordination mechanisms. These initiatives have mainly been driven by the implementation of provisions outlined in formalised regional agreements such as the SPS Annex to the SADC Protocol on Trade, to which SA is a signatory member. The main objectives of these regional mechanisms is to promote dialogue and cooperation on SPS issues in the interest of supporting uninterrupted trade of agricultural products between countries within the region. Despite the adoption of the SADC SPS Annex in 2008, the coordination mechanism in the form of the SADC SPS Regional Coordinating Committee has made limited progress in advancing robust interaction on SPS issues of regional economic importance. The region's lack of urgency to respond to the threat of the invasive fruit fly, *Bactrocera invadens*, is evidence of the inertia relating to the implementation of a SADC fruit fly management action plan, with capacity and resource constraints also playing a contributing role. Despite these challenges, SA's continued engagement in regional SPS mechanisms is unquestionable if it intends to advance national government priorities for promoting intra Africa trade. To date SPS management capacity in SA has benefited from regional SPS capacity building opportunities in the areas of conformity assessment and WTO SPS transparency training.

At a broader continental level economic integration is being driven by the Tripartite Free Trade Agreement incorporating the Common Markets for Eastern and Southern Africa (COMESA), East Africa Community (EAC) and SADC. While negotiations on SPS cooperation agreements within the Tripartite framework are still in its early stages, SA's participation will be crucial in order to ensure a balance between the economic diversity and competing SPS interests of the increased number of participating member states, some of whom are members of more than one REC.

## **6.5 RECOGNITION AND COMMUNICATION ON SPS ISSUES**

Fundamental to any SPS management system is wide scale recognition and awareness of the importance of SPS matters to domestic food safety, animal health and phytosanitary matters and its impact on export market competitiveness amongst a wide range of public and private stakeholders. Notably where this recognition and awareness is lacking, SPS management systems are likely to be overwhelmed. In SA overall awareness of the nature and importance of SPS management capacity is well established within the supply chain of key export sectors where formalised stakeholder platforms facilitate SPS dialogue. However, SPS awareness amongst senior politicians and policy makers, various components of the food and agricultural sector, as well consumers is still limited. Heightened awareness of SPS issues amongst senior politicians and consumers is often closely associated with wide spread media coverage on the negative impacts of SPS crisis issues (i.e. disease outbreaks, financial losses due to market closure; compromised food safety etc). Despite ongoing efforts to facilitate communication and advocacy on SPS issues, activities in this regard are mostly uncoordinated amongst various stakeholders, lack strategic focus and do not follow a coherent approach cognisant of stakeholder needs and requirements. Consideration will therefore be needed to appropriately capacitate resources to proactively address communication gaps in SPS information and subsequently raise the level of SPS awareness amongst diverse stakeholder groupings in a targeted and coherent manner.

## **6.6 MARKET ACCESS AND RELATED SPS ISSUES**

Key government priorities for SA articulated in national strategy documents such as the New Growth Path (NGP), National Development Plan (NDP) together with the Integrated Growth and Development Plan (IGDP) has identified agriculture as one of the key drivers for rural development through the prioritisation of appropriate investment in the various components of the agricultural value chain. The DAFF Integrated Growth and Development Plan (IGDP, 2012), seeks to identify what role players must do in order to achieve the common vision of “equitable, productive, competitive, and sustainable agriculture, forestry and fisheries sectors, growing to the benefit of all South Africans. This includes providing comprehensive support to extension services, small-holder producers and value addition of

commodities through agro-processing strategies. Pursuant to achieving these goals is the requirement for effective SPS compliance systems to ensure that improvements in production can be absorbed through better exploitation of existing and future market opportunities for the trade of SA commodities produced in the agriculture, forestry and fisheries sectors.

According to the 2011/12 export figures, South Africa's key agricultural commodity exports in terms of economic value include Citrus fruit; Wine; Grapes; Apples and Pears. In this regard the main export markets included those of the EU, the US, the Far East (Japan and Korea) and the Southern African region. While SA continues to pursue multilateral, regional and bilateral trade negotiations to expand market opportunities and ensure harmonisation of SPS rules that apply to trade, inefficiencies in its SPS management capacity has in some cases resulted in market access closures with dire economic consequences. An example of this has been the suspension of wool exports to China due to a ban imposed on the basis of an outbreak of Rift Valley Fever, a disease which in terms of OIE standards should not have affected such exports. A further example relates to the 2008 Thailand market closure for exports of SA Table Grapes, Apples, Pears, and Stone fruit, resulting from the implementation of new phytosanitary legislation in Thailand requiring mandatory Pest Risk Analysis (PRA) for each imported commodity. South Africa's loss of the Thailand fresh grape market has been estimated to be R41 billion. This figure excludes opportunity costs and job losses that accrued as a result of this market closure. These examples demonstrate the need for SPS capacity to be able to proactively monitor changing SPS standards which increasingly threaten market access.

It is evident that SA's competitiveness within the global trading environment will continue to be compromised unless it is able to address adequate development, awareness and integration of SPS capacity along the value chain and to tackle these interventions in partnership with key public and private sector stakeholders.

## **6.7 STAKEHOLDER ENGAGEMENT PLATFORMS**

The partnership model approach allows public and private sector stakeholders to combine their expertise and share the risks and costs of designing, implementing and maintaining



activities to improve SPS compliance. Experiences within the SA SPS environment over the last decade have demonstrated the potential of public private partnerships to become an integral part of improving SPS capacity and compliance. Examples where the partnership model has been effectively utilised through the institution of various committees, technical working groups and other similar mechanisms to bring together public and private sector actors with interests in various SPS issues is provided in Table 2 below. While the partnership model has worked well in addressing SPS issues in some commodity sectors such as the horticultural sector, there are still opportunities for additional cooperation and engagement in other sectors.

Table 2: Examples of SPS related stakeholder platforms

<b>Plant Health</b>	<b>Market Access Working Group for Fresh Fruit and Vegetables</b> <b>Members:</b> DAFF, Fruit and Vegetable industry representatives, Growers associations, Exporters forum, Assignees etc.	<b>Purpose:</b> Consultative forum to address technical market access and maintenance issues, phytosanitary control measures, research etc
<b>Food Safety</b>	<b>Joint Food Safety Forum and MRL Working Group</b> <b>Members:</b> DAFF, DoH, SA Bureau of Standards, Fruit and Vegetable industry representatives, Assignees, Retailers, Processors etc	<b>Purpose:</b> Consultative forum to address food safety standards (including MRLs), technical standards and market access issues, research, international food safety trends etc
<b>Animal Health</b>	<b>Red Meat Industry Forum</b> <b>Members:</b> State veterinarians and red meat industry representatives.	<b>Purpose:</b> Consultative forum to address market access issues with regard to animal health matters.

## 7. KEY ISSUES AND STRATEGIC INTERVENTIONS

Based on the overview of SA's SPS management capacity provided in the previous section it is evident that there are challenges in certain areas of the SPS system that need to be addressed. This section therefore highlights some of the key issues affecting SPS compliance and proposes a number of strategic interventions to enhance compliance.

## **7.1 Advancing SPS legislative reform, coordination and clarification of organisational mandates and responsibilities**

A major drawback of SA's extensive SPS regulatory system is that the legislative mandate is spread across several government authorities and regulatory agencies each with their own set of administrative requirements. This fragmentation inherently gives rise to challenges such as a lack of coordination for implementation and enforcement of regulatory requirements, exposing gaps in accountability where there are overlapping mandates and in some instances implementing onerous administrative processes for decision making. The ongoing legislative review process will therefore need to be cognisant of these challenges and ensure that amendments result in legislation that clarifies organisational mandates and responsibilities, is enabling with regards to domestic and international SPS related trade activities, adopts international standards and best practices in a consistent manner, promotes scientific based decision making, acknowledges SPS-related market constraints in the developing sector, and also reflects the expansion of SPS interests within the aquatic, forestry, environmental and related human health sectors. The legislative review process must be an open consultative process in order to promote transparency and give recognition to the concept that effective SPS management is a shared responsibility amongst the various actors of the SPS value chain.

### **Strategic interventions:**

- ***Review of the SPS legislative mandate:*** Ensure alignment with key provisions and principles of the WTO SPS Agreement; promote science based decision making; address SPS policy vacuums in the areas of aquatic, environment and human health related sectors; promote integrated and transparent administrative and decision making processes through clarification of roles and responsibilities; and provide for multi-stakeholder consultation and cooperation
- ***Enhance coordination and collaboration amongst SPS implementing agencies:*** Establish and enhance appropriate coordination platforms to foster dialogue and information exchange; and identify SPS regulatory focal points to expedite responses on SPS issues and streamline decision making.
- ***Strengthen oversight of delegated SPS functions:*** Implement appropriate mechanisms to facilitate monitoring, evaluation and review of SPS legislative

*functions that have been delegated to other tiers of government, regulatory agencies or assignees.*

## **7.2 Improving SPS institutional capacity to ensure consistency and compliance with international commitments**

Fundamental to improving SPS management and taking advantage of the SPS multilateral trading system is the requirement for adequate SPS capabilities in the core areas of regulatory and policy frameworks, institutional arrangements, basic infrastructure, resources and capacity. While the SA SPS system has essential foundations in place to fulfil commitments in some areas of the SPS multilateral trading system, there is still an urgent need to improve institutional capacity and SPS diplomacy in other areas, in order to achieve full compliance and maximize the benefits derived from SA's participation in these international fora. Prioritization for strengthening SPS capacity requires high level commitment from relevant government authorities that understand the importance of SPS issues and the potential impact that it has on international trade and the wider economy.

For South Africa to progress towards full compliance of the WTO SPS Agreement, continued investment in key areas of human capacity, infrastructure, financial resources and technical and / or scientific expertise will be required. In view of resource needs not being resolved within the short term, options for prioritisation and efficient rationalisation of existing resources must also be considered where appropriate. By addressing these constraints SA will be better positioned to adopt key principles and provisions of the WTO SPS agreement such as science based decision making, harmonisation, equivalence etc for its own benefit and competitive advantage.

Considering that SPS management capacity and compliance in SA depends on coordinated actions of various public and private sector stakeholders, each with their own responsibilities and expertise, opportunities should be explored to identify specific areas where private stakeholder expertise can be utilised to supplement gaps in SPS capacity.

### Strategic interventions:

- **Enhancing SPS Diplomacy:** *Ensure active and regular participation at multilateral and bilateral negotiating fora to defend SA's interests through the articulation of justified country positions.*
- **Promote international benchmarking of SPS measures:** *Advance the adoption of SPS measures that are science based, harmonised with international standards and demonstrate equivalence; promote the application of science based measures supported by risk assessments, surveillance data and peer reviewed scientific evidence.*
- **Improve rationalisation and development of SPS capacity:** *Explore opportunities for development of technical, scientific and legal capacity; Develop and maintain adequate SPS infrastructure (i.e. adequate number of laboratories that includes a system of reference laboratories, scientific data management systems, adequate number of suitable instrumentation, etc); rationalise resources to include proactive systems for monitoring of potential threats and emerging risks as part of a long term strategic focus area; and facilitate implementation of emergency response systems.*
- **Promote transparency through the SPS notification and enquiry point:** *strengthen the operations of the SPS notification office to effectively inform stakeholders of new SPS standards impacting on international markets; to solicit inputs and comments on applicable SPS measures notified by trading partners; and to encourage the notification of national SPS measures including relevant laws, decrees, regulations, requirements and procedures.*
- **Build and maintain existing SPS coordination mechanisms:** *Improve the efficiency of coordination in terms of the National SPS/ TBT committee; identify opportunities for coordination mechanisms that address specific SPS issues or functions to expedite efficient decision making, actions and responses; explore opportunities for private stakeholder expertise to offset gaps in SPS capacity.*

### 7.3 Exploiting opportunities for SPS Technical Assistance

South Africa has benefited from SPS technical assistance opportunities provided through various bilateral, multilateral and regional institutions. Such technical assistance initiatives have been directed at building SPS management capacity through scientific and technical

training in areas of risk analysis, inspection controls and laboratory practises, training on the implementation of key provisions of the WTO-SPS Agreement and the application of good practises along the export supply chain.

Experience in addressing increased market access issues, pest and disease outbreaks and the findings of SPS performance audits have emphasized that there are definite capacity constraints in the SPS value chain that could benefit from targeted technical assistance. However, fragmentation of SPS institutional structures in South Africa adds to the complexity of identifying capacity shortcomings as well as the assessment, prioritization and implementation of capacity building actions across SA's SPS value chain. As a result, SPS technical assistance has notably been uncoordinated and ad hoc and has not been guided by a broader strategic framework on SPS capacity development. It is therefore proposed that sustainable SPS capacity development in the long term would need to focus attention on building capacity that is equipped to proactively respond to evolving SPS standards in the global trade environment, adapt to the potential diversification and expansion of export commodities and markets, improve responsiveness to increasing threats of pests and diseases including food safety incidences and recognise the prominent role of the private sector in SPS compliance and their ability to complements gaps in SPS capacity where necessary.

As alluded to in section 6 of the document, it is evident that the potential need for SPS technical assistance within the SA SPS context is infinite and that the availability of funds to address all of these challenges will clearly not meet expectations. Apart from lobbying for the expansion of national budgets to build and sustain SPS capacity, alternative funding mechanisms managed through development agencies such as STDF should be explored to provide financial support for identified SPS technical assistance priorities.

#### **Strategic interventions:**

- ***Identify areas for SPS capacity development:*** *Utilise an appropriate SPS capacity evaluation tool to facilitate self assessment and prioritization of SPS capacity needs across the value chain to facilitate international benchmarking of SPS performance, capacity and implementation from an institutional and international perspective.*

- **Improve decisions on SPS capacity development:** *Develop and action a strategically focused technical assistance plan that is informed by the prioritized outcomes of the SPS capacity evaluation tool to ensure that investment in resources will make the most impact; Facilitate a system to track and monitor the impact of capacity building initiatives on the SPS value chain.*
- **Adequate financial support for SPS capacity development:** *Continue to lobby for increased public spending to support sustainable upgrading of SPS capacity across the value chain; Explore training opportunities and development agency sponsorships to fund SPS capacity initiatives that align to prioritised needs.*

#### **7.4 Enhancing market access through SPS compliance**

Trade in healthy and safe agricultural, forestry and fisheries commodities plays a vital role in ensuring global competitiveness and is a reflection of South Africa's ability to manage the level of risks associated with food, diseases, pests, natural disasters and trade. To ensure continued economic benefits from trade in healthy and safe commodities it is therefore crucial that interventions be targeted at strengthening SPS capacity to exploit current and potential export markets. Based on previous experiences where SPS non compliance culminated in market access failure with considerable economic losses to the export supply chain, strategic interventions would need to recognise the complementary roles that can be fulfilled through stakeholder partnerships.

##### **Strategic interventions:**

- **Strengthen SPS capacity:** *To facilitate exploitation of mutual recognition or equivalence of domestic production and marketing systems during negotiation of bilateral or regional agreements; effective implementation of the WTO-SPS notification mechanism as an early warning system for changes in SPS standards affecting market access of key commodities in major markets.*
- **Market Prioritisation to ensure efficient utilisation of scarce SPS resources:** *Through identified existing trade policy interventions (i.e. Agricultural Trade Strategy and Integrated Marketing Strategy for Agriculture, Forestry and Fisheries) and relevant industry expertise support appropriate mechanisms for prioritisation of commodities based on demand driven market opportunities.*

- **Improve SPS compliance for sustained market access:** Institutionalising appropriate partnerships and building on existing national mechanisms such as the SPS Market Access working Group to facilitate better integration of public and private sector stakeholders across the SPS value chain in line with previously mentioned government strategic objectives.
- **Provide SPS market access support for developing sector producers:** Facilitate dissemination of information and advocacy on SPS market access requirements to mobilise participation of smallholder producers in the export market chain.

## 7.5 Opportunities for SPS stakeholder partnerships

For stakeholder engagements to continue contributing positively towards the management of SPS compliance in SA, commitment is required from both the public and private sector. This not easily achievable when facing capacity and resource constraints, increased demands for market access facilitation and ongoing changes in market access requirements from trading partners. Also the agricultural value chain in SA is complex and includes a diverse range of stakeholders. Within the current scope of SPS related partnerships it is not always possible to retain the interests of minority stakeholders which may require consideration of alternative mechanisms for engagement with these specific commodity groups. Existing SPS related stakeholder partnerships in SA are demand driven and function to improve SPS compliance to support prioritised export markets which in turn directly or indirectly contribute to job creation, food security and rural economic development. In line with national government priorities, partnership mechanisms should also be exploited to direct SPS support to the domestic market supply chain, to specifically mobilise the upward migration of developing sector producers to comply with SPS standards and take advantage of export market opportunities.

### Strategic interventions

- **Improving stakeholder engagement through partnerships:** Explore opportunities to expand the role of partnerships to facilitate the delivery of SPS public goods and services, to address emerging trade priorities in terms of export markets, to promote

*developing sector participation in the export supply chain; and for consultation on SPS policy development and decision making.*

- ***Exploiting opportunities within multilateral or bilateral agreements to advance SPS issues:*** *Explore economic partnership agreements (BRICS, IBSA) or bilaterals as an avenue for multilateral / transnational cooperation to address specific challenges relating to SPS management capacity and compliance.*

## **7.6 Effective SPS Communication and Awareness**

The importance of SPS issues and the potential impact that SPS measures can have on international trade and the wider South African economy is not always clearly understood across the spectrum of stakeholders in the value chain including senior government officials. Considering that high-level political commitment is a prerequisite for the prioritisation of public programmes and expenditure regarding SPS issues, enhanced SPS awareness directed at the political level is crucial. In order to instill confidence in the ability of SA's SPS value chain to comply with domestic and international market requirements for food and agricultural products, SPS awareness and communication strategies will need to be re-orientated in order to be more proactive, coordinated and focused on stakeholder needs.

### **Strategic interventions**

- ***Raise awareness on the importance of SPS issues:*** *Develop and implement a comprehensive SPS communication and awareness programme that explores opportunities for utilisation of web based networks and tools, utilises various broadcast and public media, promotes dissemination of SPS information through collaboration with extension services and industry members; consider high level national workshops or media round table discussions to generate political support and buy in.*
- ***Mainstreaming SPS subject matter into the formal curriculum:*** *Explore opportunities within the existing training framework to incorporate SPS issues into relevant training curricula.*



## 7.7 Promoting Regional SPS Cooperation

Regional frameworks such as the SPS Annex to the SADC Protocol on Trade as well as formal institutional structures such as the AU/IAPSC and Inter-Africa Bureau for Animal Resources (AU/IBAR) have a prominent role to play in facilitating regional cooperation in the SPS arena. In order for these regional cooperation mechanisms to make a notable impact on SPS management capacity at both a national and regional level, attention will need to be directed at several key areas including the development of SPS regulatory frameworks, harmonisation of regional standards with international standards, optimal utilisation of scarce resources, technical assistance, participation at ISSBs, improving coordination and collaboration, trade facilitation and advancing regional SPS interests through targeted interventions and regional positions. Key to the success of these regional approaches is the need for commitment of resources, practical implementation by all countries in the region and the appropriate monitoring of progress and impact on the uptake of SPS interventions at both a national and regional level. While SA acknowledges its own limitations and challenges in terms of its SPS capacity, its involvement in regional cooperation mechanisms is imperative as it provides opportunities to share information and experiences on best practises, to establish networks of shared expertise and provides a platform for robust dialogue on SPS standards that impact trade facilitation in the region.

### Strategic interventions

- ***Active participation in regional SPS coordination mechanisms or institutions:*** Advance positions for harmonisation of regional standards consistent with international benchmarks, regular consultation within the region for formulation of regional SPS positions, sharing of scientific and technical expertise on SPS matters, promote technical assistance that facilitates optimal utilisation of scarce resources; influence the focus of regional strategic priorities in favour of SPS challenges of regional economic importance and interest.

## **8. IMPLEMENTATION FRAMEWORK**

Implementation of this strategy will be driven by the Directorate: Food Import and Export Standards and designated technical competencies for plant health, animal health and food safety in collaboration with other relevant directorates within DAFF, related government departments, agencies and stakeholders. To ensure the successful implementation of the strategy, the implementation framework will be formulated through the development of specific implementation plans with detailed budget implications, resource requirements, defined roles and responsibilities and performance measures to monitor and track progress in achieving the strategy's objectives.

Implementation of this strategy will enhance existing policy interventions and ongoing actions already approved and implemented within the disciplines of plant health, animal health and food safety to avoid duplication of effort. Where appropriate strategic actions will be prioritised and systematically addressed to ensure maximum impact on SPS compliance for safe and fair trade of agricultural and food products in both the domestic and international market.

## **ANNEXURE A: REFERENCES**

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## **ANNEXURE B: List of Acronyms**

ALOP	Appropriate Level of Protection
APHFS	Agricultural Production Health and Food Safety
AU/IAPSC	Inter-African Phytosanitary Council of the African Union
AU/IBAR	Inter-Africa Bureau for Animal Resources
BCOCC	Border Control Operational Coordinating Committee
CBS	Citrus Black Spot
CODEX	Codex Alimentarius Commission
COMESA	Common Markets for East and Southern Africa
DAFF	Department of Agriculture, Forestry and Fisheries
DAH	Directorate Animal Health
DAIC	Directorate Agricultural Input Control
DoH	Department of Health
DPH	Directorate Plant Health
Dti	Department of Trade and Industry
EAC	East Africa Community
EU	European Union
FAO	Food and Agriculture Organization
FMD	Foot and Mouth Disease
FSQA	Directorate Food Safety and Quality Assurance
GMO	Genetically Modified Organisms
IGDP	Integrated Growth and Development
IPPC	International Plant Protection Convention
ISSB	International Standards Setting Bodies
MRL	Maximum Residue Limit
NEP	National Enquiry Point
NNA	National Notification Authority
NRCS	National Regulator for Compulsory Specifications
OIE	World Organisation for Animal Health
PPP	Private Public Partnership
PRA	Pest Risk Analysis
SA	South Africa

SADC	Southern African Development Community
SAPS	South African Police Service
SACU	Southern African Customs Union
SARS	South African Revenue Service
TBT	World Trade Organisation Agreement on Technical Barriers to Trade
TFTA	Tripartite Free Trade Agreement
WHO	World Health Organization
WTO SPS	World Trade Organisation's Agreement on the Application of Sanitary and Phytosanitary Measures