



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

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Your reference: DG (SANCO)/2013-6936
Our ref: AH – 13/1/14/2/

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Dear Dr Scannell,

RE: FVO AUDIT IN SOUTH AFRICA FROM 20 MAY 2013 TO 29 MAY 2013 IN ORDER TO EVALUATE THE ANIMAL HEALTH CONTROLS IN PLACE IN RELATION TO EXPORT OF EQUIDAE TO THE EU, WITH PARTICULAR REFERENCE TO AFRICAN HORSE SICKNESS

The letter and draft report dated 26 June 2013 sent to the Directorate Animal Health refers.

Attached please find the following:

1. South Africa's factual comments on the draft report of the audit carried out in South Africa from 20-29 May 2013
2. Response of the competent authority of South Africa to the recommendations of the Report ref. DG (SANCO)/2013-6936-MR of an audit carried out from 20-29 May 2013 in order to evaluate the Animal Health controls in place in relation to the export of equidae to the EU, with particular reference to African Horse Sickness.

Yours faithfully


Dr. Mpho Maja
DIRECTOR: ANIMAL HEALTH

Date: 2013-07-30

South Africa's factual comments on the draft report of the audit carried out in South Africa from 20-29 May 2013

Page and point number	Copy of EU comment	Correction
Page 1, under point 2, "Objectives"	2 stop-over isolation stations, 1 holding in free area, 1 holding in surveillance zone	In addition, a holding in the protection zone was visited (Highlands farm).
Page 3 point 4.2, second last paragraph	including EU	certain EU member countries
Page 3 point 4.2, last paragraph	The number of equidae imported from neighbouring countries was not available.	The attached table (annex) was included in the information pack provided during the visit.
Page 4 point 5.2, "findings"	This latter department	This latter Chief Directorate
Page 5 point 5.2, "findings, first paragraph"	Approved laboratories also send all results of tests on controlled diseases to the CCA.	Approved laboratories must send all results of tests on controlled diseases to the PCA – some are copied to the CCA as well.
Page 5 point 5.2 "Observations", third bullet	The SR1 form of the first suspect case was sent only after confirmation, with less information than in the sample submission form (many horses had died in the vicinity in the previous two weeks).	The horses in the vicinity had shown a febrile reaction (there were no deaths)
Page 5 point 5.2 "Observations", fifth bullet	foot-and-mouth diseases outbreaks.	foot-and-mouth disease control measures.
Page 5 point 5.2 "Observations", sixth bullet	under evaluation	is in the final stages of implementation, implementation is planned for 1 January 2015
Page 6 point 5.3.1, first paragraph	covering based on ISO 17025 principles	based on ISO 17025 with additional requirements

Page 6 point 5.3.2	semi-nested PCR	hemi-nested PCR
Page 8 point 5.3.3 "observations", fourth bullet	The structure had worked on the 2006 outbreak in the surveillance zone and identified with PCR a sub-clinically infected stallion. The responsible staff member indicated that such a case would be difficult to detect through serology.	The structure had worked on the 2006 outbreak in the protection zone and identified that a sub-clinically infected horse which had previously been vaccinated against AHS and moved to the farm was a probable source of the infection (Weyer <i>et al</i> Equine Veterinary Journal 2013)
Page 11 point 5.4.2 "observations", first bullet	One of them required the the outline diagram be drawn by a veterinarian	Rules for issuing passports are defined by each passport issuing organisation, one of those being that the outline diagram be completed by a veterinarian.
Page 12 point 5.4.3, fourth paragraph from the top of the page	Movements of all equidae within a same zone in the control area are free, but must occur during daytime (between 2 hours after sunrise to 2 hours before sunset).	Movements of all equidae within a same zone in the control area do not require a state veterinary movement permit (there are no official rules with regards to time of day for the movement).
Throughout the document	National Horseracing Association	National Horseracing Authority
Page 23, point 5.8 Observations, third last bullet	Transport of horses to the airport was not performed under official supervision	Transport of horses to the airport is always performed under official supervision, and pictures were provided to demonstrate the vector-protected transport

IMPORTS OF HORSES FROM JANUARY FROM JANUARY 2012 TO 30 APRIL 2013

No.	Number of permits issued	Number of horses imported	Country of origin
1	166	523	Namibia
2	49	190	Botswana
3	34	185	Zimbabwe
4	13	31	Swaziland
5	3	15	Lesotho
TOTAL	265	944	

ANNEX

Response of the Competent Authorities of South Africa to the recommendations of Report ref. DG(SANCO)/2013-6936-MR of an audit carried out from 20 to 29 May 2013 in order to evaluate the Animal Health controls in place in relation to export of equidae to the EU, with particular reference to African Horse Sickness

N°.	Recommendation	Action Proposed by the Competent Authority
1	<p>To review the organisation of the competent authority, in order to have a clear designation of roles and responsibilities for the AHS control programme and ensure that sufficient staff are provided for its effective application.(Article 12 (2)(c) of Council Directive 2009/156/EC)</p>	<p>South Africa has had a PVS evaluation. The report is being reviewed at a Ministerial level. There are certain actions that will follow the evaluation, in order to implement the resultant recommendations.</p> <p>In addition a Provincial African horse sickness (AHS) Management framework (with clearly defined roles and responsibilities and decision trees) will be concluded with a view to implementation by 1 January 2014.</p>
2	<p>To clarify and ensure that the competent authority have adequate legal powers to enforce the rules related to the AHS control programme.(Article 12 (2)(c) of Council Directive 2009/156/EC)</p>	<p>There is a long-term legislative review process.</p> <p>In the meantime an attempt will be made to strengthen the legal powers in the Western Cape Province by means of legal ordinances.</p>
3	<p>To review the organisation and capacity of the laboratory network, in order to ensure consistent and reliable diagnosis capacity; to clarify the diagnostic procedures; to validate the tests used in the local context (vaccination / infection).(Article 12 (2)(c) of Council Directive 2009/156/EC)</p>	<p>All laboratory testing relating to equine diseases will be reviewed to ensure testing for all equine diseases including AHS, Glanders and EIA is of an international standard. The review will include available expertise; compliance with the DAFF approval system and clear roles and responsibilities and decision trees. Laboratory experts will be engaged in interpretation of test results.</p>

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N ^o .	Recommendation	Action Proposed by the Competent Authority
4	To organise a monthly sero-epidemiological monitoring programme for AHS, at least meeting the conditions set out in point 6.1 and 6.2. of Annex I to Council Decision 2008/698/EC, and following the recommendations of Article 12.1.15 of the OIE Code.	The Western Cape Province will institute a monthly sero-epidemiological monitoring programme in accordance with 2008/698/EC.
5	To develop and implement a contingency plan following outbreaks in the control area, in order to demonstrate the absence of virus following the implementation of control measures.(Article 12 (2)(d) of Council Directive 2009/156/EC and equivalence to Article 9 of Council Directive 92/35/EEC)	The contingency plan following an outbreak in the AHS controlled area will be updated, to focus on structured surveillance based on epidemiological evaluation and risk analysis to demonstrate the absence of virus following the implementation of control measures.
6	To develop and apply validated procedures ensuring that no horse will be certified if an increase of antibody level is observed between the first and second samples for AHS and equine encephalosis.(Points III (l) and (m) of Certificate F of Decision 93/197/EEC, and Points III (k) and (l) of Certification F of Decision 92/260/EEC)	A review of the diagnostic protocols will be undertaken, taking into consideration recommendations made by the OIE ad hoc group on harmonization of bluetongue, AHS and EHD.
7	To ensure that the risk control measures applied in the rules for import of equidae from third countries are consistently applied (for neighbouring countries, and for all diseases, including glanders).(Article 12 (2)(i) of Council Directive 2009/156/EC)	A risk assessment will be commissioned for the importation of equidae from neighbouring countries. Thereafter, import conditions will be re-negotiated with neighbouring countries.
8	To adopt adequate measures in order to ensure the absence of	Incorporate testing for dourine into monthly surveillance.

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N°	Recommendation	Action Proposed by the Competent Authority
	dourine from the territory of dispatch.(Article 13 of Council Directive 2009/156/EC)	A targeted dourine surveillance, educational and awareness programme will be enhanced and continued.