



agriculture,
forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

VETERINARY PUBLIC HEALTH STRATEGIC IMPLEMENTATION PLAN TO THE VETERINARY STRATEGY

Directorate: Veterinary Public Health: Draft Work Group Report

04 June 2015

FOREWORD

Food-borne disease remains a major health problem in both developed and developing nations. Endless parade of food safety scares have happened over the last decades. Major contributors for the emergence of the diseases have been globalisation of the food industry, agricultural practices, other complex reasons and the lack of establishment of effective and efficient veterinary public health systems in many countries which have resulted violation of constitutional functions and rights whereby it is required that governments strategies be key drivers in the accomplishment of livestock health and consumer protection.

The current strategic plan is formulated to focus on strengthening of Veterinary Public Health (VPH) systems governance for increased productivity, improved food security, enhanced food safety and trade and public health protection, taking into account evolving and emerging food safety risks, global trends and best practices.

The strategic plan is in line with the outcomes of the National Development Plan, Veterinary strategy, South Africa's international obligations on VPH matters, national and provincial strategies focussing on: sustainable growth and development within the food and agricultural industries; improve market access to local and international role players, human capital development within the field of VPH, research and technology development and community development with specific reference to rural communities. The plan incorporates priority areas captured in the Medium Term Strategic Framework of Government.

The National Executive Officer (NEO) designated under the Meat Safety Act (Act No 40 of 2000) in the Department of Agriculture, Forestry and Fisheries (DAFF), plays a key role in ensuring that the strategic plan for Veterinary Public Health (VPH) is properly formulated and acted upon.

I trust that this plan will be fundamental in achieving the departmental goals and strategic objectives to enhance trade at both national and provincial levels.

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SOUTH AFRICAN VETERINARY PUBLIC HEALTH STRATEGY

1 VISION, MISSION AND DEFINATION OF VETERINARY SERVICES IN SOUTH AFRICA

1.1 Vision:

To improve the livelihoods and wellbeing of South Africans and market access by reducing health risks associated with animal source food

1.2 Mission:

To enhance the economic, quality health care for all and social wealth of the people of South Africa especially small holders farmers and processors and ensure sustainable market access for regulated products of animal origin.

2. What is Veterinary Public Health

Veterinary Public Health is a fundamental part of public health that safeguards human health and well-being through an integrated approach aimed at assuring a high level of prevention and control of zoonosis and food safety through coherent farm-to-table measures. Broadly, it is defined as *the contributions to the physical, mental and social well-being of humans through an understanding and application of veterinary science.*

The VPH in this strategy therefore specifically highlights the role of VPH in areas of zoonotic disease control and surveillance; controls aimed at preventing food borne illnesses; obligations towards environmental care and international health regulations; the incidence of disease occurrences as well as the socio-economic impact of such occurrences in communities.

The Key Performance Areas where VPH is expected to play a role are as follows: Policy (legislation) development; Compliance monitoring; Promoting food safety; Import and export facilitation; Risk analysis and communication; Veterinary medicinal products and biological; Animal welfare; Identification and traceability of products of animal origin; Feed safety; Food safety laboratories approval; Epidemiological surveillance and early detection; Disease prevention, control and eradication (zoonoses) and Emergency response and preparedness.

3. PURPOSE OF THE VPH STRATEGY

The purpose of this strategy is to strengthen Veterinary Public Health (VPH) systems governance for increased productivity, improved food security, enhanced food safety and trade and public health protection. taking into account evolving and emerging food safety risks, global trends and best practices.

The strategy addresses gaps and disparities in the current VPH system in South Africa taking cognizance of the requirements of the value chains in the agricultural food sector in South Africa (that has become increasingly complex); multidisciplinary nature of actions required for optimal control to ensure consumers protection and fulfilment of obligations under various regional and international agreements and treaties to which the country is a signatory. It aims to support the Government policies, objectives and priorities in the provision of effective and efficient national sanitary risk management on food products of animal origin for sustainable economic growth and development.

4. VETERINARY PUBLIC HEALTH IN SOUTH AFRICA AND INTERNATIONAL TRENDS

4.1 International Trends in Veterinary Public Health

The widespread fraud of the global food and consumer products such as substitution of livestock products in an incredibly complex food supply systems and changing globalized environment is on the increase and has been identified globally as a public health threat due to distinct possibility of harm of citizens who ingest such unsafe food products. In year 2014, fraud in food and consumer products is estimated to cost the global industry about US\$10-15 billion a year, with the cost of one adulteration/substitution incident averaging between 2-15 percent of yearly revenues depending on existing control systems per individual country.

Due to Veterinary Public Health's evolution, it has become an integral public health tool used to identify novel diseases, monitor their spread, design vaccines and antiviral treatments as well as disease mitigation strategies to protect the general public. Veterinary Public Health is expected to continue to develop against the background of rapid increases in population growth, urbanisation, poverty, land use and distribution strategies, environmental and climatic changes.

Globally, the emergence and re-emergence of diseases at the interface between human and animal ecosystems is an ever-growing concern. Countries and international organizations have responded to this threat with the re-emphasis and discussions around the "One Health' concept. At the national level, it is important to establish mechanisms for collaboration and cooperation between Veterinary Services and other governmental services, particularly those responsible for public health and the environment.

Pathogens often breach the barriers between animals and humans and it is important for modern veterinary legislation to provide for effective linkages between the Veterinary Services and other relevant governmental bodies and describe their roles and responsibilities including their joint responsibilities and for stakeholder communication.

Two of the policies that are paramount to the strategies employed within Veterinary Public Health include: health central to human development, and sustainable health systems to meet people's needs that are based on the sound foundation of primary health care principles.

4.2 Veterinary Public Health And The African Context

Veterinary Public Health activities are carried out through different Ministries and Departments in different African countries. In countries such as Benin, Kenya and Morocco, these activities are carried out by the Livestock Department/Directorate, or the Animal Health Department/Directorate in Libya.

In some countries, Veterinary Public Health responsibilities are often shared within a given Department/Directorate between its subdivisions dealing with animal health on the one hand and food hygiene/food protection on the other, as observed in Tunisia.

In a limited number of countries, some of the responsibilities that traditionally belong to Veterinary Services and fall within the Veterinary Public Health concept are carried out by the Ministry of Health and/or local governments (municipalities). This is the case in Zimbabwe and Namibia where Veterinary Public Health issues related to food of animal origin (mainly inspection) for national consumption remains within the Ministries of Health. However, in these countries, the registration of export abattoirs/premises where food is prepared, as well as the inspection of meat and dairy products for exports, remains the responsibility of Veterinary Services. In Botswana, Zambia and Swaziland, with the exception of a limited number of slaughterhouses (mainly for export of beef), food inspection is carried out under the supervision of the Ministry of Health and Local Municipalities.

In Ghana and Mali, inspection of food of animal origin and premises where they are prepared, is shared between the Ministry of Agriculture and the Ministry of Health. In Algeria, at municipality/communal level, food hygiene control is carried out by mixed units composed of veterinarians and physicians.

Although the existing Veterinary Public Health structures in Burkina Faso, Eritrea, South Africa, Namibia and Zimbabwe carry the same VPH name, they do not have the same scope of

responsibilities. In South Africa, Veterinary Public Health staff is mainly responsible for meat safety at abattoir level. The combatting of illegal slaughtering outside abattoir premises and the control of animal by-products are also carried out by VPH units in a majority of Provinces. The national VPH Directorate is also responsible for primary animal health care and animal welfare. Export facilitation for food of animal origin in Provinces is carried out by either VPH, Export facilitation or Animal Health units.

In Zimbabwe, Veterinary Public Health branches deal only with the control of meat and dairy products for export. In Burkina Faso and Eritrea, the Veterinary Public Health section is responsible for the quality control/inspection of food of animal origin and animal by-products, zoonoses surveillance and control (especially bovine tuberculosis, brucellosis and rabies), as well as the control of entry of live animals and animal products into the country.

In countries without established Veterinary Public Health units/branches, different levels of Veterinary Services' contribution to Public Health preservation/improvement or Veterinary Public Health have been reported. In countries such as Algeria, Angola, Burkina Faso, Central African Republic, Eritrea, Ghana, Guinea, Kenya, Libya, Malawi, Mali, Morocco, Senegal, Tunisia, Zaire and Zambia Veterinary Public Health responsibilities are essentially twofold and cover food hygiene (of animal origin, including seafood) and zoonoses (surveillance, prevention and control). The major zoonotic diseases most often mentioned are rabies, brucellosis, bovine tuberculosis, anthrax, cysticercosis and hydatidosis.

Some countries (e.g. Algeria, Ghana, Libya, Mali, Morocco and Zambia) have ongoing national programmes for the control/elimination of some of these diseases, mainly brucellosis, bovine tuberculosis and rabies. In parts of Africa, especially eastern Africa, other zoonotic diseases are considered important (Rift Valley fever and trypanosomiasis).

Food hygiene and food-borne disease prevention activities are in many countries mainly carried out at abattoir/slaughterhouse level. Some national Veterinary Services (e.g. Algeria, Guinea, Morocco and Central African Republic) are responsible for the control of the entire feed-food chain, i.e. from farm to plate, whereas in some others (Zambia and Swaziland), food inspection after slaughter and especially at retail level does not fall under national Veterinary Services. In Swaziland with the exception of one slaughterhouse for export, food inspection is carried out under the supervision of the Ministry of Health and local municipalities while VPH responsibilities are confined to the control of some zoonoses (e.g. rabies and cysticercosis).

Many of the countries such as Benin, Botswana, Madagascar, Namibia, Zimbabwe and South Africa that placed emphasis on food hygiene, mainly through ante- and post-mortem inspection at abattoir level are or have been previously major exporters of red meat, especially beef, to the European Union and other international markets.

A number of countries have other areas/fields under Veterinary Public Health, such as research on animal diseases and zoonoses (e.g. Mali), epidemiological studies and risk assessment for possible common sources of disease in humans and animals (e.g. Morocco), education/training of certain professional groups, such as farmers and the public at large, on zoonoses (e.g. Benin and Ghana), prevention of environmental risks in relation to the animal industry and derived pollutants (e.g. Kenya, Madagascar, Malawi and Morocco), control of animal feed safety (e.g. Morocco) and legislation drafting (e.g. Mali and Zimbabwe).

Some countries (Malawi and Central African Republic) have incorporated all veterinary activities aimed at improving animal production, thereby increasing the supply of food of animal origin in their understanding of Veterinary Public Health responsibilities.

4.3 Historical perspective and background to Veterinary Public Health in South Africa

The National Development Plan published in 2011 advocates that South Africa promotes health, reduces poverty, nurtures economic growth, creates jobs and employment opportunities, builds capacity and involves communities in their development in order to raise the living standards of all its inhabitants.

Since the dawn of democracy in 1994, South Africa faced numerous challenges relating to food security, education, health services, water and sanitation, electricity, social security and housing. The proportion of people living in rural areas since 1994 have declined by about 10% and estimations indicate that 60% of all South Africans are living in urban areas which is expected to increase to 70% by 2030.

The National Planning Commission (NPC) has also identified the need to address the concerns of unemployment and highlighted that new employment opportunities may arise from activities that are domestically oriented due to the high labour component and the fact that global competition may be less intense within our local environment. The Plan identified small scale agriculture as a major focus area and advocates that the demand for these products or services should be increased with a stern effort to ensure support to these small scale farmers in terms of access to credit, ease of the regulatory environment and enhancing growth potential of such farmers.

The socio-economic environment within South Africa, gave rise to a developing trend where more and more people are introducing subsistence farming practices into urban and peri-urban areas or in close proximity to residential areas. This in itself poses significant challenges to the Veterinary Public Health profession in terms of informal farming, illegal slaughtering, disease surveillance and control, incidence of zoonosis and environmental pollution.

South Africa is a diverse society that consists of many cultures with varied cultural practices that impact on production and consumption preferences. This diversity is further impacted upon by the fact that we have an immigrant population which increases by between 0.1 and 0.2 percent annually, straining the country's ability to effectively administer Veterinary Public Health services. Veterinary Public Health within South Africa will have to align itself to the strategic environment within which it finds itself to achieve national objectives and overcome contemporary challenges. VPH fulfills a critical part of Public Health with a link between the health triad, people-animals-environment, which is concerned with the administration of health, consumer, agriculture and environmental protection, zoonoses control and food hygiene. Although significant progress has been made, it must be said that a lot remains to be done within South Africa in terms of defining the role of Veterinary Public Health within the country.

Historically Veterinary Public Health in South Africa focussed on hygiene control at facilities that slaughtered approximately 80% of the livestock in the country. The legislative environment in which Veterinary Public Health operates has changed significantly, impacting exponentially upon the scope and the mandate of Veterinary Public Health services within the country.

In addition, the International trends have also had a major influence on legislation as well as the traditional perceptions around Veterinary Public Health. In principle, the scope of Veterinary Public Health is beyond the applications of the Meat Safety Act.

By ensuring that the country's consumers are being supplied with food of animal origin that is safe to eat and supporting fair trade on livestock value chains, Veterinary Public health has become the cornerstone of sustainable economic growth worldwide. However, a number of problems currently bedevilling the South African Veterinary Public Health system were noted in various reports, and most recently in the 2013 OIE PVS evaluation report. Some of the prominent challenges noted are poor delineation of Veterinary Public Health responsibilities within the Branch Agricultural Production, Health and Food safety and other sectors and slow adaptation to a fast changing environment to achieve its goal.

There is general public and consumer dissatisfaction with the rendering of veterinary public health service with a perception that veterinary public health services are more skewed toward urban areas and to animal products destined for the export market. The more rural areas are generally neglected for meat inspection and other activities. The level of monitoring of use and application of veterinary medicines, pesticide, hormone and antibiotic residues is also very limited or non-existent. The disjointed legislation regulating the food industry also means that gaps exist in the safeguarding of the hygiene control of products as it traverses the food processing and distribution chain. Currently, there is limited level of residue monitoring of veterinary medicines, pesticide, hormone and antibiotics at abattoirs. The need to improve Sanitary and Phytosanitary (SPS) systems in particular food safety system in South Africa is a long standing matter with the first

iteration being in 1998 and subsequent follow ups in 2001, 2004 and 2007. At executive level, announcements were made by Republic of South Africa presidents Mr Mbeki and Mr Zuma in August 2008 and in October 2010 respectively. In response, the government of South Africa cabinet approved the National Policy on Food & Nutrition Security in 2014 where a pillar on Food Security and Risk management whose outcome must be formation of a centralised food safety control system (Food Safety and Quality Assurance Unit for South Africa). This is a step towards the creation of an integrated Food Control Agency; however there has been little progress in this area as no task team has been officially appointed to execute the deliverables.

Recent developments such as the debate on independence or lack thereof of meat inspection services, the import debacle, the horse meat scandal, the fiasco around processed meats, the escalation of game farming and game meat production and many more have all played a part in prompting a re-think on the role of Veterinary Public Health within the South African context.

Cognizance must be given to positive developments owing to some of the above challenges. These positive developments include the establishment of:

- a) An Independent Meat Inspection (IMI) working group that investigated and submitted a proposal depicting best practices aimed at addressing current and future challenges in terms of meat inspection within the country;
- b) A National Abattoir Rating Scheme (NARS) working group that drafted the scheme aimed at improving the hygiene management and practices at abattoirs;
- c) A National Advisory Committee for Veterinary Public Health, with the objective of regularly discussing VPH related matters and advising on strategies and their implementations at national and provincial levels;
- d) Veterinary Public Health Strategy Development sub-committee aimed at drafting a comprehensive Veterinary Public Health strategy for the country.

5. CONSTITUTIONAL MATTERS AND CURRENT POLICIES AND REGULATORY FRAMEWORK

5.1 Constitutional arrangement

Constitutional mandates – the Constitution of the Republic of South Africa (Act 108 of 1996) dedicates an entire Chapter to the Bill of Rights of South African citizens. The Bill of rights, *inter alia* focuses on rights such as the right to have access to sufficient food and water which is stipulated in section 27 (1) (b).

The constitution further regulates the relationship between the different spheres of government. In relation to VPH, schedule 4; Part A stipulates the concurrent national and provincial functional

areas as Agriculture, animal control & diseases, disaster management, Environment, Trade, urban and rural development. Schedule 5; Part A stipulates abattoirs, provincial planning and veterinary services (excluding regulation of the profession) as functional areas that are exclusive to provincial legislative competence. Schedule 5; Part B, provinces regulates and monitors municipal implementation of fencing and fences, Markets, and Municipal abattoirs.

Having regarded the provision of schedule 4 and 5, section 146 of the constitution makes provision of dealing with conflicting national and provincial laws. National legislation that applies uniformly throughout the country prevails over provincial legislation, if any of the following conditions are met:

- (a) The national legislation deals with a matter that cannot be regulated effectively by legislation enacted by the respective provinces individually.
- (b) The national legislation deals with a matter that, to be dealt with effectively, requires uniformity across the nation, and the national legislation provides that uniformity by establishing: (i) norms and standards; (ii) frameworks; or (iii) national policies.

5.2 Current Policies and Regulatory Framework

Current national and provincial policies that have an impact on the VPH strategy are: Integrated Growth and Development Policy (IGDP) for Agriculture, Forestry and Fisheries, The Agricultural Policy Action Plan (APAP) - This seeks to translate the high-level responses offered in the IGDP, into tangible, concrete steps.

APAP aligns itself to the New Growth Path (NGP), National development plan (NDP), Medium Term Strategic Framework (MTSF), Industrial Policy Action Plan (IPAP), Comprehensive Agricultural Support Programme (CASP), SADC Agricultural policy, Bio-economy strategy, Sanitary and Phytosanitary strategy, Draft Veterinary strategy, Primary Animal Health Care strategy, Draft Animal welfare policy, Provincial growth and development strategies and Provincial spatial development strategies.

International policies include the Sanitary and PhytoSanitary agreement of the World Trade Organisation and its three associated organization namely the World Organization of Animal Health (OIE), Codex Alimentarius and the International Plant Protection Commission (IPPC).

South Africa's sanitary management capacity is supported directly and indirectly by extensive policies supported by subordinate regulatory framework with principle acts, regulations, policies, strategies and relevant norms and standards in different government departments and institutions. Of note are:

- a. Meat Safety Act (Act 40 of 2000); Agricultural Products Standards Act (Act 119 of 1990);

- b. Animal Diseases Act (Act 35 of 1984);
- c. Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act (Act 36 of 1947);
- d. Foodstuffs, Cosmetics and Disinfectants Act (Act 54 of 1972);
- e. National Environment Management Act (NEMA) (Act 107 of 1998);
- f. National Disaster Management Act (Act 57 of 2002);
- g. National Water Act (Act 36 of 1998);
- i. Water Services Act (Act 108 of 1997);
- j. Marketing of Agricultural Products Act (Act 47 of 1996);
- k. Veterinary and Para-Veterinary Professions Act (Act 19 of 1982);
- l. Medicines and Related Substances Control Act (Act 101 of 1965);
- m. Consumer Protection Act (Act 68 of 2008);
- n. National Regulator for Compulsory Specifications Act (Act No. 5 of 2008)

6. PILLARS FOR A TRANSFORMED VETERINARY PUBLIC HEALTH STRATEGIC FRAMEWORK IN SOUTH AFRICA

Currently VPH authority is fragmented horizontally between DAFF and DoH. Moreover both authorities suffer the same vertical fragmentation of their chain of command between national, provincial, district and even municipal levels. In addition, the processing of animal products is under the responsibility of the VS when they are exported, and under the responsibility of the DoH when they are sold on national market. The driving outcome on strengthening veterinary public health is to ensure a similar level of food safety to all national consumers as to international consumers. This can be achieved through:

Pillar 1: Undertaken regulation, authorisation and inspection of relevant establishments (and coordination, as required) in conformity with international standards for premises supplying the national and local markets.

Pillar 2: Restore the presence of public health veterinary staff for independent meat inspection at all slaughter sites to be responsible for ante and post mortem inspection at abattoirs and associated premises (e.g. meat deboning / cutting establishments and rendering plants). A key point for the quality of the VS is to ensure a high level of competence in food inspection and less overreliance on veterinary para-professionals (e.g. meat inspectors) without effective supervision of veterinarians.

Pillar 3: Focus on developing adequate legislation for the safety of products of animal

origin and restore the presence of public health veterinary staff for Inspection of collection, processing and distribution of products of animal origin

Pillar 4: Restore *authority, capability and* strengthen control of the VS on distribution and use of veterinary medicines and biologicals in order to comply with international concern on prudent use, to limit risks of drug resistance as well as develop inspection system of feed related facilities.

Pillar 4: Exercise and strengthens regulatory and administrative control for aspects of animal feed safety

7. SOUTH AFRICA VPH STRATEGIC APPROACH

The question asked is to what extent does or can VPH in South Africa contribute to the outcomes of the NDP, Growth Path, Integrated Growth and Development Plan, Industrial Policy Action Plan, Agriculture Policy Action Plan? This document aims at providing specific layout of the outcomes that may be directly or indirectly linked to VPH.

The strategic objectives of VPH incorporates strategic approaches aimed at ensuring consumer safety and promoting social responsibilities in order to identify, monitor and control risks to humans, animals and the environment.

The strategies and approaches will keep abreast of legislative, environmental and technological challenges and are based on setting and achieving the overall goals or objectives of the Republic of South Africa and its trading partners. It is imperative that these goals and objectives reflect the management and functional responsibilities of the profession and make provision for changes that may occur in the nature of the work and the environment in which it operates.

The main challenge of the Department of Agriculture, Forestry and Fisheries is that each provincial Department will have to align its strategic plan, which may be different from within provinces and national strategic plan. The challenge of national versus provincial non-uniformity may actually have the advantage of allowing the provincial departments to bring a broader range of strategic objectives to the VPH field.

The biggest challenges facing the small and medium in the livestock and food sector is the need to develop and meet regulatory standards that enable companies to sell their products to national and international markets. In order for VPH to support sustainable growth and development within the food and agricultural industries and reduce the impact of regulations on economic growth and developmental policies, this strategy proposes the creation of a section on VPH business technical advisory team whose responsibility will be to work with interested companies to adopt, develop and implement responsible livestock value chain regulatory practices to increase on food trade and distribution.

8. VPH STRATEGY IMPLEMENTATION MECHANISMS FRAMEWORK

8.1 Conditions for successful implementation

This strategy is intended to support the development, implementation and monitoring of sanitary risk management strategies and other sanitary measures covered in the scope. The effective and efficient implementation of this strategy is the primary responsibility of the Chief Directorate Animal Health and Production together with the respective provincial structures. Strong political will and commitment to the VPH strategy by all the respective national and provincial departments and key stakeholders through alignment with VPH national and provincial policies, strategies and programmes is a prerequisite.

Sufficient funding provision from national treasury and establishment of a strong monitoring and evaluation system are necessary tools. It is important that the current legislation (Meat safety Act) is revised and additional legislation introduced to align the strategy with national and international obligations of Veterinary Public health. However, the execution of the legislation will need to be aligned with other relevant national laws and or standards such as the Independent meat inspection and Abattoir rating scheme. It is important for provincial Veterinary Services, under which provincial VPH falls, to align as closely as possible to the National Strategic Objectives for national uniformity. However, it is important that the National Strategic Objectives must be assessed to determine relevance and bearing on the field of VPH in order to ascertain the direct and indirect contributions to the outcomes of the Provincial objectives.

8.2 Financial instruments

Funding Options

The levels of funding and types of resources will be from the industry levies, national and provincial budgets. The strategy will be operationalised in line with the overall VPH budgets. The VPH service model to be implemented will initially be combination of government meat inspection service and assignees. A Public Private Partnership (PPP) cost sharing model have been explored

at highthroughput abattoirs and processing facilities where the meat industries funds the costs of inspection through a levy system since the Meat Safety Act, 2000 prescribes that the owner of an abattoir must procure a meat inspection service for the abattoir. This means that the abattoir owner has the responsibility to partially fund the cost of meat inspection at his/her abattoir to ensure that safe meat is placed on the market.

Government will fully fund meat inspection service at infrequently slaughtering low throughput and rural abattoirs and processing facilities and for officials placed on a full time basis to all high throughput and frequently processing low throughput facilities for oversight and monitoring of meat inspection by service providers.

Should the Minister exercise the right to take over meat inspection service at all abattoirs in the country in case the dual system of assignees and government is not functional, funding for VPH system implementation must come from government, as public health protection and animal disease control is a public good.

Cost recovery instruments

The financial resources and other capabilities will be harnessed through an agreed cost recovery mechanism for VPH services by government officials as stipulated in the Meat safety Act and with the approval of treasury. Sufficient funding provision from national treasury will be required.

Should the Minister exercise the right to take over meat inspection service at all abattoirs in the country in case the dual system of assignees and government is not functional, there are different options on how to recover the cost of meat inspection per abattoir, namely:

1. Cost per individual meat inspection personnel allocated to a particular abattoir, or
2. Cost per slaughter units allocated to the abattoir as per the maximum throughput indicated on the registration certificate., or
3. Cost per throughput category. In this option, high, low and rural throughput abattoirs will have a pre-determined rate independent of the number of inspectors or their allocated slaughter units, or
4. Cost per slaughter unit categories to be determined. In this case a system of grouping abattoirs into categories to be determined independently to the prescribed categories will be created and abattoirs charged according to the category they fit into, or
5. Cost determined according to actual slaughter figure at a predetermined rate per slaughter unit.

All levies are currently coordinated by the NAMC on behalf of DAFF and the food industry. Possible points of levy collection could be through imposition of a levy in respect of designated poultry, wildlife, animals, meat and animal products, hides, skins and processed meat as stipulated in the regulations to be determined under the Marketing of Agriculture Products Act (Act No 47 of 1996).

8.3 Institutional and corporate governance structures

Food scandals have occurred for so long in South Africa and the world at large with little remedial action due to the silos created by the government departments' internal and external profoundly fragmented structures. National and provincial departments responsible for food control are marked by both internal and external fragmentation and dysfunctional organisational matrix leading to tunnel vision and failure by their directorates/units to pass crucial information to each other or take responsibility for flaws in the veterinary public health protection system.

The Directorate of Veterinary Public Health in the Department of agriculture, Forestry and Fisheries has a director, deputy director, four state veterinarians, six control veterinary public health officers and eleven veterinary public health officers. The structures in the provinces are variable, but in most provinces, consist of a deputy director, a VPH state veterinarian, and veterinary public health officers.

Generally, VPH is overshadowed by other veterinary functional areas, with a few cases where it is well represented in the provinces. In order to fulfil the requirements of this strategy and other national strategies, additional personnel (specialised, skilled, semi-skilled, and administrative) will be needed at both national and provincial levels. An efficient and effective operational structure is needed in order to give direction of command and responsibility. It is proposed that such a structure be operative for this programme at three levels namely: national, provincial and district/site levels with each level having its own distinct functions.

Stakeholders responsibilities

The national department of Agriculture shall take all the necessary measures to effectively develop this strategy, and in particular, to define more precisely the national institutional structure, the financing system and lastly the monitoring and evaluation mechanism. The provincial departments shall take all the necessary measures to effectively implement this strategy, and in particular, to define more precisely the plan of action, the provincial institutional structure, the financing system and lastly the reporting on monitoring and evaluation mechanism periodically to the provincial and national departments.

The effective and efficient implementation is the primary responsibility of the Department of Agriculture, Forestry and Fisheries together with key role players, including but not limited to:

- Provincial Departments of Agriculture
- Department of Health

- Department of Labour
- Department of Trade and Industry
- Municipal Health Services
- South African Veterinary Council (SAVC)
- Health Professions Council of South Africa (HPCSA)
- Academic Training Institutions and other training providers
- South African Poultry Association (SAPA)
- Red Meat Industry Forum (RMIF)
- Wildlife Ranching South Africa (WRSA)
- South African Ostrich Business Chamber (SAOBC)
- Meat Inspection Service Providers
- Abattoir Owners,
- Animal Welfare Organizations

Commitment by the national and provincial departments and all the respective key role players through alignment with national and provincial policies, strategies and programmes is a prerequisite.

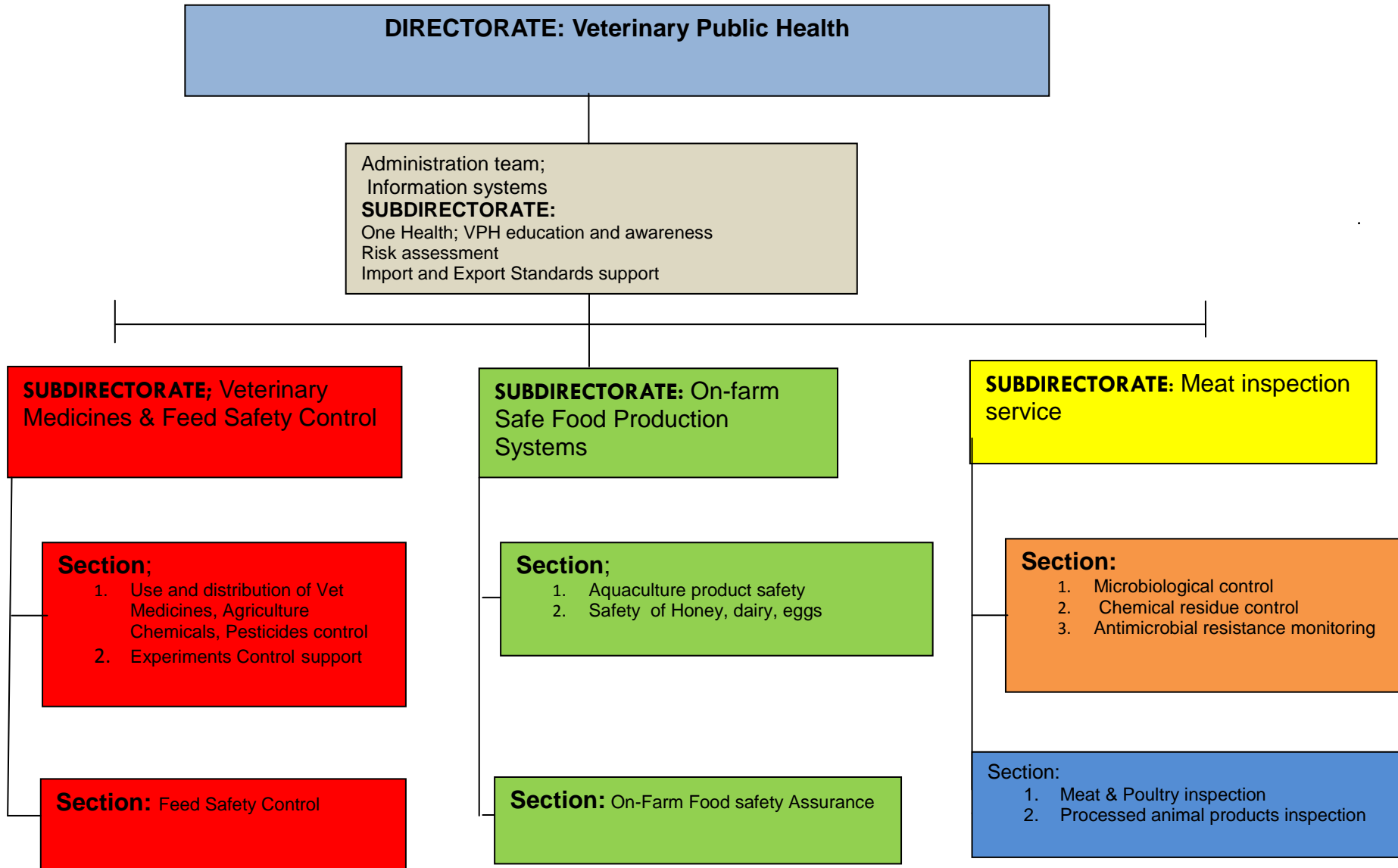
IMPLEMENTATION PLAN

The model for VPH in the country will be implemented in phases and concurrently with the implementation of the meat inspection service component. The proposed measures will enhance the provision of VPH services and assist the food industry to access regional and international markets. Proposed timeframes for the deployment of VPH officials to the provinces and facilities will be covered in detail in the draft implementation of meat inspection scheme document.

Activity	Responsibility	Role players/ Dependency Deliverables	Timeline	
			Start Date	End Date
Development of revised VPH organisational structure	<ul style="list-style-type: none"> • Director: VPH 	<ul style="list-style-type: none"> • Directorate Human Resources Management (HRM) • Directorate Human Resources Development (HRD) • Organisation Development Committee (ODC) 	01 August 2015	30 March 2016
Approval of a costed VPH organisational structure by Minister	<ul style="list-style-type: none"> • Minister of Agriculture 			31 May 2016
Processing of DAFF funding	<ul style="list-style-type: none"> • National 	<ul style="list-style-type: none"> • CFO 	01	31 December

request by the national treasury and approval of policy option and granting of budget	Treasury		August 2016	2016
MTEF allocation of funds	<ul style="list-style-type: none"> National Treasury 	<ul style="list-style-type: none"> CFO 	April 2017	Ongoing
ODC submission and approval of posts	<ul style="list-style-type: none"> Director: VPH IMI Workgroup 	<ul style="list-style-type: none"> ODC HRM 	01 January 2017	31 March 2017
Advertisement of posts	<ul style="list-style-type: none"> Director: VPH 	<ul style="list-style-type: none"> ODC HRM 	01 April 2017	Ongoing per feasible number
Receiving of applications/interviews/vetting/appointments	<ul style="list-style-type: none"> Director: VPH HRM 	<ul style="list-style-type: none"> Suitably qualified applicants HRM 	01 May 2017	Ongoing
Resumption of duty	<ul style="list-style-type: none"> HRM 	<ul style="list-style-type: none"> Incumbents Director: VPH 	01 August 2017	Ongoing
Confirmation of office space for personnel (where applicable)		<ul style="list-style-type: none"> Abattoir owners PDAs Meat industry organisation 	01 September 2015	Ongoing

The proposed national VPH organisational structure is as shown in the tables below:



The proposed time frames to address short comings in the training of VPH officials are as follows:

Activity	Responsibility	Role players/ Dependency Deliverables	Timeline	
			Start Date	End Date
Appointment of a training monitoring working group	<ul style="list-style-type: none"> National Executive Officer 	<ul style="list-style-type: none"> Provincial Executive Officers Meat industry stakeholders Training institutions Meat inspection service providers 		30 March 2016
Draft guidelines on recognised aspects pertaining to skill set, education and training	<ul style="list-style-type: none"> Training Monitoring Working Group NEO 	<ul style="list-style-type: none"> Department of Higher Education and Training Training Institutions Professional bodies 	01 September 2015	31 March 2016
Define required Qualifications, registration, professional conduct, ethical behaviour, and continuing professional development for persons doing meat inspection	<ul style="list-style-type: none"> Training Monitoring Working Group NEO 	<ul style="list-style-type: none"> Training Institutions Professional bodies 	01 September 2015	31 march 2016
Draft guidelines for liaison with professional bodies and training institutions regarding review and endorsement of curriculum	<ul style="list-style-type: none"> Training Monitoring Working Group NEO 	<ul style="list-style-type: none"> Training Institutions Professional bodies 	01 September 2015	31 march 2016
Implementation of guidelines	<ul style="list-style-type: none"> Training Monitoring Working Group NEO 	<ul style="list-style-type: none"> Training Institutions Professional bodies 	01 July 2016	Ongoing

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10. STRATEGIC ACTIONS

VPH: Food Safety

A. Regulation, authorisation and inspection of establishments for production, processing and distribution of food of animal origin

1. Definition of the Critical Competency		
<i>The authority and capability of the VS to establish and enforce sanitary standards for establishments that produce, process and distribute food of animal origin.</i>		
2. Desired Level of Advancement (DLA)		
4. Regulation, authorisation and inspection of relevant establishments (and coordination, as required) are undertaken in conformity with international standards for premises supplying the national and local markets.		
3. Strategy to reach the Desired Level of Advancement(if relevant)		
<p>The VS will recover the authorisation to inspect all animal product processing establishments including for the national market (currently under the responsibility of DoH).</p> <p>The establishment of the single agency may present an opportunity to rebuild the chain of command to the field relating to meat, dairy and egg product inspection depending on the legislative status/authority of this agency. The VS may consider incorporating animal health within this agency under a mandate of “farm to fork” whole chain food safety assurance.</p>		
4. Activities to implement (chronological)		
Specific activities	<ul style="list-style-type: none"> <input type="checkbox"/> Target gaining responsibility for processing food safety standards (including for establishments) in consultation with DoH. <input type="checkbox"/> Continue to work with DoH and DTI in the development of the single food safety agency including maintaining sanitary standards for relevant establishments. <input type="checkbox"/> Develop good data on the number of distribution outlets by category (butcheries, supermarkets, local meat markets, restaurants) <input type="checkbox"/> Develop protocols for inspection of these animal product distribution outlets. <input type="checkbox"/> Train and assign enough staff for the authorisation and inspection of all slaughter establishments in the country, including adequate transport 	
Activities linked to cross-cutting	Consultation	Work closely with DoH and DTI on food product establishment inspection.
	Legislation	Analyse the legislative authority that might accompany the development of a single food safety agency
	Continuing Education	
	Communication	
	Management of resources and operations	
	Official representation	
5. Objectively verifiable indicators		
Registration of facilities and agreement process all along the food chain		

VPH Food safety

B. Independent Meat Inspection-Ante and post mortem inspection at abattoirs and associated premises (e.g. meat deboning / cutting establishments and rendering plants)

1. Definition of the Critical Competency
<i>The authority and capability of the VS to implement and manage the inspection of animals destined for slaughter at abattoirs and associated premises, including for assuring meat hygiene and for the collection of information relevant to livestock diseases and zoonoses.</i>
2. Desired Level of Advancement (DLA)

4. Ante- and post mortem inspection and collection of disease information (and coordination, as required) are undertaken in conformity with international standards for export premises and for all

3. Strategy to reach the Desired Level of Advancement(if relevant)

The VS will restore slaughter inspection as a function implemented by public staff (or under official delegation) and will progressively establish presence of veterinarians on site, in order to supervise meat inspectors directly.

4. Activities to implement (chronological)

Specific activities		<ul style="list-style-type: none"> <input type="checkbox"/> The priority over the next 5 years will be to implement: full time veterinary inspection in all national <u>high throughput slaughterhouses rural and other</u> and low throughput slaughterhouses continuing to be inspected by meat inspectors with secondary veterinary inspection. <input type="checkbox"/> The VS directly or indirectly employ veterinarians and veterinary paraprofessionals in meat inspection. This service will be cost recovered through a levy per carcass inspected; ensuring that small establishments are not disadvantaged and can afford this inspection service. <input type="checkbox"/> Central and provincial VS will develop and implement periodic, random audits of veterinary meat inspection activity. <input type="checkbox"/> Continue to work with DoH and DTI to develop food safety agency. <input type="checkbox"/> Ensure that provincial laboratories have relevant budget to implement more regular food safety analysis
Activities linked to cross-cutting competencies	<i>Consultation</i>	Continue to liaise with the meat industry in the development of an improved, expanded, independent veterinary meat inspection system.
	<i>Legislation</i>	Review legislation and regulations relating to slaughterhouse inspection, including penalties.
	<i>Continuing Education</i>	Train private veterinarians involved in part time ante and post mortem inspection for relevant slaughterhouses. Train auditors in Food Safety.
	<i>Communication</i>	Develop a communication plan relating to the new independent, veterinary inspection system.
	<i>Management of resources and operations</i>	Establish a database to nationally collate ante and post mortem inspection findings nationwide, including as a contribution to animal health surveillance.
	<i>Official representation</i>	

5. Objectively verifiable indicators

Single animal product food safety authority.
 At least one veterinarian involved with on site food safety inspection on all high throughput and rural slaughterhouses. Independent meat inspection with government employing inspectors directly or indirectly (e.g. officially delegated private veterinarians).

VPH: Food Safety

C. Inspection of collection, processing and distribution of products of animal origin

1. Definition of the Critical Competency

The authority and capability of the VS to implement manage and coordinate food safety measures on collection, processing and distribution of products of animals, including programmes for the prevention of specific food-borne zoonoses and general food safety programmes.

2. Desired Level of Advancement (DLA)

3. Implementation, management and coordination (as appropriate) are generally undertaken in conformity with international standards only for export purposes and for products that are distributed throughout

3. Strategy to reach the Desired Level of Advancement(if relevant)

The VS will take responsibility for developing and implementing food safety standards in all animal product processing facilities. This will mean expanding responsibility from exported products to also include products processed for the national market. This aligns with the principle of maintaining consistent food safety standards between export and national markets, where the veterinary authority maintains whole chain responsibility for the purposes of food safety certification as required by international standards and trading partners. The food safety measures and oversight of animal product distribution will remain the responsibility of DoH and NRCS until such time as a single overarching agency may be formed. In the interim, the VS will enhance external coordination with their DoH and DTI colleagues through exploring the establishment of a single central animal product food safety agency covering the whole animal product supply chain, including animal product collection, processing and distribution.

4. Activities to implement (chronological)

Specific activities		<input type="checkbox"/> A VS specialist veterinarian will be required to develop an on-site food safety risk analysis and risk management procedures for animal product food processing plants (meat, milk and eggs). The development of this protocol could be paid for by the processor (cost recovered). <input type="checkbox"/> The VS would undertake periodic audits of this protocol to ensure proper implementation. <input type="checkbox"/> Assign enough human resources for processing inspection
Activities linked to cross-cutting	Consultation	Close consultation with DoH on arrangements for food safety standards in processing establishments.
	Legislation	
	Continuing Education	
	Communication	Enhance communication (including formal mechanisms) with DoH/DTI to link food safety aspects of farming, slaughter/collection, processing and distribution e.g. food safety incident trace back and trace forward until such time as a single central agency is formed.
	Management of resources and operations	
	Official representation	

5. Objectively verifiable indicators

Registration of processing establishments by VS
 Inspection reports and files of each processing establishments
 Resources allocated for this inspection
 Registration of distribution establishments by DoH and inspection reports and process

VPH: Veterinary medicines and biologicals

1. Definition of the Critical Competency

The authority and capability of the VS to regulate veterinary medicines and veterinary biological, in order to ensure their responsible and prudent use, i.e. the marketing authorisation, registration, import, manufacture, quality control, export, labelling, advertising, distribution, sale (includes dispensing) and use (includes prescribing) of these products.

2. Desired Level of Advancement (DLA)

3. The VS exercise effective regulatory and administrative control for most aspects related to the control over veterinary medicines and veterinary biological in order to ensure their responsible

3. Strategy to reach the Desired Level of Advancement (if relevant)

The VS will develop regulations over distribution and usage of veterinary medicines

4. Activities to implement (chronological)

	Specific activities	<ul style="list-style-type: none"> <input type="checkbox"/> Enhance coordination and communication within DAFF and between the VS and DoH in veterinary drug control (scheduled and over-the-counter). <input type="checkbox"/> Improve expertise for evaluating applications for drug registration in certain specialist fields of regulatory science (e.g. toxicology). <input type="checkbox"/> Continue to explore the sharing and/or recognition of international evaluations of veterinary drugs to shorten time and effort involved in national registration. <input type="checkbox"/> Review and update veterinary drug legislative arrangements to introduce greater veterinary control of distribution and use, including reclassification of some drugs to scheduled consideration of a single Act, changing some drug classifications to scheduled (e.g. tetracyclines, vaccines).and establishing protocols for prudent use of antimicrobials. <input type="checkbox"/> Close loop-holes relating to large scale medicinal compounding undertaken by veterinarians, particularly in the intensive industries (medicated feed and autogenous vaccines). <input type="checkbox"/> Provide adequate resources for implementation <input type="checkbox"/> Progressively impose link between veterinary drug distribution and veterinary practice
Activities linked to cross-cutting	Consultation	Consult closely with DoH and the veterinary pharmaceutical industry.
	Legislation	Review current legislative arrangements for veterinary drugs.
	Continuing Education	
	Communication	Develop communication about new regulations and prudent use for farmers and veterinarians
	Management of resources and operations	Organize data collection about veterinary medicines distribution and usage, including at farm level
	Official representation	
5. Objectively verifiable indicators		
Regulations on distribution and use of veterinary medicines		
Activity reports		
Involvement of veterinarians in veterinary medicines distribution		

VPH: Animal feed safety

1. Definition of the Critical Competency		
<i>The authority and capability of the VS to regulate animal feed safety e.g. processing, handling, storage, distribution and use of both commercial and on-farm produced animal feed and feed ingredients.</i>		
2. Desired Level of Advancement (DLA)		
3. The VS exercise regulatory and administrative control for most aspects of animal feed safety.		
3. Strategy to reach the Desired Level of Advancement(if relevant)		
The VS will achieve development of a formal national programme for feed safety based on the new Fertilizer and Feeds Bill, including registration of all feed importers, producers and suppliers, and an audit programme.		
4. Activities to implement (chronological)		
Specific activities	Identify priorities, needs and resources for an updated national feed safety programme, based on the new legislation. Provide adequate resources for this activity	
Activities linked to cross-cutting	Consultation	Consult with the feed industry.
	Legislation	Develop relevant legislation review
	Continuing Education	Train staff in relevant feed safety activity, including audits and sampling.
	Communication	
	Management of resources and operations	Ensure that data management capture feed inspection and analysis

Official representation	
5. Objectively verifiable indicators	
Regulations and staff and activity reports related to feed safety.	

Trade: National and International certification

1. Definition of the Critical Competency		
<i>The authority and capability of the VS to certify animal products, services and processes under their mandate, in accordance with the national legislation and regulations, and international standards.</i>		
2. Desired Level of Advancement (DLA)		
5. The VS carry out audits of their certification programmes, in order to maintain national and international confidence in their system.		
3. Strategy to reach the Desired Level of Advancement(if relevant)		
The credibility of the VS export certification system should be sustained and strengthened by progressively developing an internal QA system of export certification, restoring the chain of command, reviewing central VS structures, developing a field veterinary network in regular contact with animals and farmers, improving external coordination, and improving technical independence in general and in particular in meat inspection.		
4. Activities to implement (chronological)		
Specific activities	<input type="checkbox"/> Develop and implement an internal QA system for the export certification system. <input type="checkbox"/> Review the central VS organogram and provincial roles to analyse the internal chain of command relating to export certification. There should be a clear and direct link between the certification process and what is being certified (i.e. national animal health and VPH activity). These activities are currently in different Chief Directorates in the central VS which may negatively influence information flows, increase the number and timing of procedures etc. The involvement of provincial authorities in export certification further complicates the system.	
Activities linked to cross-cutting	<i>Consultation</i>	Consult with exporters on the certification QA/audit system
	<i>Legislation</i>	
	<i>Continuing Education</i>	Train those undertaking QA/audit activities
	<i>Communication</i>	
	<i>Management of resources and operations</i>	Maintain records of QA/audit activity
	<i>Official representation</i>	
5. Objectively verifiable indicators		
QA system for export certification. External audits such as from trading partners		

Appendix 1:

The proposed overall overall management structure for the restructured veterinary services is shown below:

Critical Competencies related to Management and Regulatory Services	No of units of each level	Human resources			
		Veterinarians	Other university degree	Veterinary para-professionals	Support staff
Total Management and regulatory services					
Central level					
General Directorate					
Chief Veterinary Officer (CVO) Specialist Legal officers Epidemiology, Data management & Risk Analysis Auditing and Quality assurance					
ANIMAL PRODUCTION AND TRACEABILITY					
Coordination of animal identification and traceability Product Traceability Animal Production					
COMMUNITY VETERINARY SERVICES					
Animal Welfare Primary Animal Health Care Compulsory Community Service (CCS) Continuing education management					
ANIMAL HEALTH					
Production animal and Dairy Health Aquatic Animals Health Poultry Health Companion animal health Zoonosis Diseases Wildlife Health and Bees keeping Veterinary Drugs, Biologicals and Experiments coordination					
VETERINARY PUBLIC HEALTH					
Slaughterhouses & Processing facilities inspection coordination Aquatic, Honey, Dairy & Egg facilities inspection coordination Veterinary medicine, residues and feed On-Farm Food Safety One Health					
VETERINARY TRADE AND IMPORT CONTROL COORDINATION					
Imports Standards Exports standards International trade, agreements etc					
LABORATORY SERVICES					
Diagnostics Laboratory Quality assurance, Accreditation & PT support Laboratory data management support Food Safety and Hygiene					
Field level of coordination					
1st level of field coordination					
Animal Health & Welfare Veterinary Public Health & Export control Identification and traceability, Data management, Epidemiology & Risk analysis Laboratories					
2nd level of field coordination					
District Deputy Director/ State Veterinarian					

