agriculture,
forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

DISCUSSION PAPER ON THE REVIEW OF BOVINE BRUCELLOSIS CONTROL IN SOUTH AFRICA

Contents

Acronyms

AHT	**Animal Health Technician**
AIRT	**Animal Identification, Recording and Traceability system**
CCS	**Compulsory Community Service**
DAFF	**Department of Agriculture, Forestry & Fisheries**
DAH	**Directorate: Animal Health**
NDP	**National Development Plan**
OIE	**Office International des Épizooties (World Organization for Animal Health)**
PVS	**Performance of Veterinary Services evaluation**
SAVC	**South African Veterinary Council**

1. Purpose

This document outlines the principles, objectives and proposed direction for reviewing the approach to bovine brucellosis control in South Africa, including the regulatory framework. It calls for a broad spectrum of stakeholder comments and inputs on the suggested approach that will be considered in the development of a comprehensive bovine brucellosis policy for the country.

2. Scope

This discussion document focusses on bovine brucellosis control, i.e. *Brucella abortus* infection in cattle.

3. Objectives

The objectives of reviewing the current approach to bovine brucellosis control in South Africa are to:

- Provide more effectively for the control of bovine brucellosis within all provinces in South Africa.
- Ensure the promotion of animal health and human health through a relevant bovine brucellosis control strategy.
- Promote collaboration between the government and private sector to enhance bovine brucellosis control as part of working towards a common goal.
- Reflect internationally recognized principles, standards and strategies to control bovine brucellosis.
- Better align the regulatory framework with departmental priorities related to food security economic growth and rural development.

The above objectives will address key notes of the DAFF Mission Statement by developing and sustaining a sector that contributes and embraces:

- Economic growth and development (in the livestock sector through increased animal production and reproduction).
- Job creation (through expanding the Veterinary Services work force) and to promote job security on farms from sustainable and growing beef and dairy livestock enterprises.
- Rural development (will aid in bringing Veterinary Services to rural communities and provide a source of direct contact).
- Food security (increased livestock production and reproduction, safer milk).

Furthermore, the objectives of the review are in line with:

- the essence of the NDP (National Development Plan) and
- the strategic objectives of the South African Veterinary Strategy that was consulted extensively during the first half of 2016.

4. Background

The Department of Agriculture, Forestry and Fisheries (DAFF) is undertaking a review of the current approach pertaining to the control of bovine brucellosis, including the following legislation:

- Animal Diseases Act (Act 35 of 1984)
- Animal Diseases Regulations (R.2026 of 1986)
- Bovine Brucellosis Scheme (R.2483 of 9 Dec 1988)

- Bovine Brucellosis Interim Manual – contains practical information regarding brucellosis and more comprehensively describes the pathogenesis of the disease, testing procedures, interpretation and disease control measures (http://www.daff.gov.za/daffweb3/Branches/Agricultural-Production-Health-Food-Safety/Animal-Health/information/dahpolicy)

It is anticipated that a publicly consulted comprehensive bovine brucellosis policy will lead to a revised operational and regulatory framework and will reduce non-compliance, improve consistency in the application of relevant legislation and enhance the ability to provide for the control of bovine brucellosis within all provinces of South Africa.

Livestock production and the consumption of animal products are crucial to the nutritional well-being and food security of millions of people within South Africa. Animal derived protein (milk and meat) plays an important role in the food industry and is an important contributor to safe, abundant and affordable high quality protein for a growing population.

Bovine brucellosis caused by *Brucella abortus*, is a chronic herd disease that negatively impacts on cattle production and reproduction by causing abortions, still-born and weak calves, retained placentas, decreased milk yield and reduced fertility in bulls. Brucellosis is zoonotic and can infect humans through consumption of raw milk, through slaughtering infected animals without protection and through handling of aborted foetuses and afterbirths of infected cows. Debilitating disease ensues if humans are infected which may become recurrent or chronic if not treated efficiently in a timely manner. The most effective way of reducing the impacts of the disease on livestock and prevent human infection is to control this disease in the animal population.

The existing legislative framework reflects the internationally recognized principles of controlling bovine brucellosis by established test and slaughter methods. When government funding and manpower available for the control of this disease was prioritised nationally and the general compliance of livestock owners with regulatory requirements was high, the initial Schemes achieved good control of bovine brucellosis and the occurrence of the disease was very low in the mid- to late 1980s. Since the responsibility of continued testing and vaccination was handed over to livestock owners in the late 1980s and the provincialized structure was introduced in 1994, a gradual increase in the occurrence of the disease has been observed, mainly due to non-compliance with the prescribed control measures. This review explores options for reversing this trend.

Cattle farming comprises of different types and classifications of enterprises and these need to be taken into account during policy development. Currently, the compliance of livestock owners with the applicable bovine brucellosis legislation and the enforcement thereof by government is severely lacking. In addition, experience has shown that livestock diseases cannot be controlled by law enforcement alone and that social dynamics play a critical role in determining success. The envisaged new approach thus needs to provide for a collaborative effort of government together with all role players in the private sector and communities, pursuing a common goal of reducing the occurrence of bovine brucellosis. The relative contributions and required collaboration of all stakeholders, including State Veterinary Services, livestock owners, farmer associations, stud breeders associations, private veterinarians, laboratories, abattoirs, milk processing facilities and other industry role players are thus important considerations in designing a sustainable future strategy.

It is against this background that the South African government is reviewing the current situation and approach with the view to provide more effectively for control of bovine brucellosis to benefit both animal health and production, and human (public) health.

The approach is in line with the 2016 South African Veterinary Strategy. Extensive consultations during the formulation of the Strategy suggested strongly that a revived bovine brucellosis control programme should serve as a pilot project and model for the strengthening of Veterinary Services as a whole. The National Animal Health Forum together with DAFF established a Brucellosis Steering Committee at the end of July 2016. This Committee embarked on formulating an intensive brucellosis awareness campaign during September 2016 and this discussion document is a further stepping stone in the required revival of bovine brucellosis control in South Africa.

In order to promote the buy-in of all stakeholders and role players into the final revised bovine brucellosis policy, an all-inclusive approach has been chosen by releasing this Discussion Document on the Review on Bovine Brucellosis Control for an initial round of public consultation prior to compiling a draft policy.

5. Discussion points for stakeholder inputs

Initial communication with internal and external stake holders revealed several key factors that would have to be considered in order to successfully revise the current bovine brucellosis control strategy and a structured approach to this initial round of public consultation will greatly facilitate the consideration of all inputs received. The following points were thus chosen as the basis for comments and feedback by interested parties:

5.1.Compulsory testing of all bovines within South Africa for bovine brucellosis

According to the current Bovine Brucellosis Scheme, testing for bovine brucellosis is compulsory only for high-risk herds that have been confirmed as, or are suspected of being, infected. For all other herds and livestock owners, entering into a brucellosis testing scheme is voluntary. Thus, while government resources are being prioritized to retest and control the bovine brucellosis in infected or suspect herds, the status of many herds that were not classified as high-risk remains unknown. Livestock owners may thus not know the status of their herds and may inadvertently buy and sell animals from infected herds. As explained in the introduction, it is not in the interest of both animal and human health for the bovine brucellosis status of a cattle herd to not be known. Undetected infected herds pose a high risk to the client or consumer who buys animals or animal products, especially milk and meat, from such herds. Such a consumer should have the right to expect that live cattle being bought originate from a test-negative herd and that milk and meat originate from either a test-negative herd or, in the case of an infected herd, a herd that complies with the control measures ensuring the products are rendered safe for human consumption.

However, although this may negatively affect the health and production status of their herds, many livestock owners prefer not to have their herds tested or actually refuse to do so because they are worried that the movement restrictions that would be imposed in the case of their herd testing positive would apply only to their herd and not to the untested herd of their competitor – they are thus worried that they will be 'punished' for being compliant i.e. there is no incentive for maintaining a negative herd and there is a perception of inviting losses to oneself for being

compliant. This obviously leads to the disease not being detected and, if the disease is not detected, it cannot be controlled. This lack of testing has led to widespread dissemination of bovine brucellosis across the country. The only solution that will level the playing field is to incentivise the compliance of compulsory testing for all cattle herds on a regular basis in such a way that nobody is allowed to sell cattle or cattle products without having established the bovine brucellosis status of the herd of origin and having auditable records to substantiate such. This would encourage cattle owners to take responsibility for establishing and ensuring the health status of their herd. Such compulsory testing requirement has also been shown to be an essential element of successful bovine brucellosis control programmes in other parts of the world. The success of a compulsory testing programme would be much enhanced by a functional Animal Identification, Recording and Traceability system (AIRT).

In addition, most outbreaks of bovine brucellosis are caused by livestock owners acquiring cattle from herds that are infected (with the status of the herd of origin being either unknown or not disclosed to or requested by the buyer or infected animals sold knowingly by dishonest farmers). In order to empower the sellers and buyers of cattle and encourage livestock owners to take responsibility for maintaining the health status of their herd, the legislation covering compulsory testing should possibly include the obligation for cattle sellers and buyers to ensure that they only acquire and sell animals that have tested negative to a valid official brucellosis test (the entire herd of origin should have official brucellosis negative status or the animal(s) for sale should have a valid negative test result).

The manner and appropriate intervals for such compulsory testing is a subject of this review. The testing would obviously have to be conducted by appropriately authorized professionals who, according to the Veterinary and Para-Veterinary Professions Act (Act No. 19 of 1982), are South African Veterinary Council (SAVC) registered Veterinarians and Animal Health Technicians. Although it is not required that the testing has to be conducted by state veterinary services personnel, the testing and results thereof should be only carried out by authorised personnel in an authorised laboratory and notified to the State Veterinary Services in order to ensure that the data of the occurrence of bovine brucellosis can be captured and monitored officially and to ensure that appropriate actions are taken in the case of a positive test outcome. The official data generated would go a long way towards establishing the animal health status of the national herd and to monitor the progress of the control measures in an objective manner.

A compulsory testing programme would prescribe that ordinary movements of cattle between farms are restricted to animals originating from known test-negative farms and herds – while movements of animals from infected herds would be allowed only under specific prescribed precautionary measures for direct or indirect slaughter and under state veterinary control. Auctioneers and speculators would be required to serve as a very important control point as it would be the responsibility of (i) both the auctioneer or speculator who accepts cattle into his custody, (ii) the farmer who sells his or moves cattle off his farm (iii) and the farmer who buys or moves animals onto his farm, to ensure that the farm and herd of origin tested negative for disease.

> *Comments and further suggestions on the proposed details and intervals for such compulsory testing are invited.*

5.2. Prohibition of the movement of live animals from herds infected with bovine brucellosis other than for purposes of slaughter

According to the current Bovine Brucellosis Scheme (R.2843 of 9 Dec 1988) 10.3.b(iii) bovines from an infected herd may be moved to any other destination if the bovines concerned have shown negative results in two successive tests carried out not less than three months apart, and these bovines are kept separate from all other bovines from the date of commencement of the first of the two tests until reaching its destination. This has since been identified as a high risk activity given the variable incubation period of brucellosis as well as latently infected brucellosis heifers that can lead to a 2 year breakdown syndrome and re-infection of a susceptible herd. Only once quarantine has been lifted off an entire farm (herd) should animals be sold/ moved again. An Animal Identification, Recording and Traceability system (AIRT) would facilitate the required movement control and assist in ensuring that bovines from quarantined farms are not sold/ moved.

The sale or movement of test negative animals from infected herds under quarantine should be avoided at all costs. This will mean that no animal movement off a quarantined farm should be allowed except for slaughter. A proposal to send animals to regulated feedlots prior to slaughter may be considered depending on an industry implemented, independently inspected and auditable traceability system to ensure that animals from infected herds that are sent to feedlots are actually slaughtered in the end.

Comments and further suggestions on the proposed details regarding quarantine, enforcement of AIRT and movement control are invited.

5.3. Improved implementation of compulsory heifer vaccination for brucellosis

Vaccination of all heifers within South Africa between the ages of 4 and 8 months has already been legislated as compulsory, but is not being adhered to since the responsibility has been transferred to livestock owners, who do not comply. The limited resources available to State Veterinary Services have failed to ensure that the vaccination is being conducted and to police it on a large scale. Vaccination however is essential to build up national herd immunity.

An alternative approach that has been proposed would entail all livestock owners having to keep certain vaccination records (invoices, dates, etc.) and permanently identify vaccinated animals. Identification may be achieved by using metal ear clips that can be attached to plastic identification tags. A system where government supplies brucellosis vaccine may be considered in exchange for relevant information about the vaccinated animals being supplied by livestock owners. Compliance of owners, safe use of the vaccines and vaccination at the right time (if S19 is used) has been shown to be crucial to the success of any brucellosis control programme.

Note that the DAFF Directorate: Animal Health is aware of the current challenges faced with the availability of S19 vaccine. RB51 vaccine is available as an alternative; however this discussion document also calls for any viable solutions to the current S19 vaccine shortages.

Comments and further suggestions on the proposed details regarding compulsory heifer vaccination strategies are invited.

5.4. Optimization of the test and slaughter control measures for bovine brucellosis in infected herds

The current system of controlling and eradicating bovine brucellosis in infected herds by repeated regular testing and slaughter of test-positive animals, is in line with international best practices. However, incentives for farmers are required in order to: present their animals for regular testing, identify their test-positive animals and to comply with the movement and other control measures imposed on an infected farm.

Many farmers see the requirement to present animals for testing on a regular basis as an organizational disincentive rather than a necessary aid to eradicating the disease from their herd. As it is impossible to control the disease in a herd without the active participation of the farmer; this results in many herds remaining infected for unduly prolonged periods of several years thus posing a risk to neighbouring herds and potential clients. While the compulsory testing requirement will certainly increase the incentive, further comments and suggestions are invited on this subject.

The identification of test-positive animals in infected herds is another area for possible optimization. While the current system still provides for animals that test 'suspect' to be retested and remain in the herd indefinitely unless they test 'positive' at some stage, international opinion tends to favour the stricter interpretation of test results in an infected herd with elimination of both infected as well as 'suspect' animals from the herd as soon as possible in order to hasten the eradication of the disease from the herd. Furthermore, the current system allows test-positive animals to remain in the herd until the end of their lactation period or until calving, while international opinion seems to favour the early elimination of such animals in the interest of speeding up the resolution of such outbreaks.

A similar issue has been identified with regard to the heifer calves of positive cows that are allowed to remain in the herd, while international expertise seems to favour the preclusion of such heifers from the breeding herd because of the potential for them to be infected and the prolonged incubation period of bovine brucellosis unduly delaying the detection of such infected animals for up to several years. The current compromises contained in the 'Interim Manuals' were introduced in order to minimize the economic losses for the owner of the infected herd – however, some of them may unduly delay the eradication of the disease within a herd and thus be counter-productive.

Another issue that has come up repeatedly is the fact that the presence of bovine brucellosis above a certain high level of prevalence within a herd may prolong the required period that a test and slaughter approach has to be followed to such an extent that the exercise becomes futile and it has been recommended that such herds should be prioritized for a complete slaughter-out with certain conditions and incentives. Comments are invited on this and similar proposals.

Control and eradication of bovine brucellosis in infected herds are also being delayed by several factors that currently discourage some livestock owners from slaughtering test-positive cattle including the reluctance of abattoirs to slaughter cattle that test positive with a resultant lower slaughter price being paid to the farmer, and the negative effect of eliminating dairy cattle from

a herd while they are in milk and possibly pregnant as well as the replacement costs of dairy cattle being higher than slaughter value.

Comments and suggestions are thus invited on how the current test and slaughter policy could be made more effective without unduly increasing the economic losses of the farmer (all sectors). In order to formulate a sustainable policy, comments and suggestions are also invited proposing potential incentives (not necessarily of a monetary nature) and arrangements that may overcome the issues which currently discourage the slaughter of many infected animals. Comments and suggestions on the issues regarding optimization of the test and slaughter control measures should include the points mentioned above as well as other issues identified by role players and experts.

5.5.Compulsory abortion notification

Abortion notification is currently not legislated, but would be of great value in alerting entities timeously to address potential underlying infectious factors, which would include Brucellosis, Rift Valley Fever, Campylobacteriosis, Q-fever, Toxoplasmosis, Leptospirosis, etc. (which all have zoonotic potential). This could serve as a high alert system to potentially identify active brucellosis infection.

Comments and further suggestions on the proposed details regarding compulsory abortion notification are invited.

5.6.Diagnostic reporting format for laboratories

Government is currently funding brucellosis serological tests and culture (if submitted through State Veterinary Services); however there is no database to show for it and no information on the outcomes of what is being paid for. Currently, brucellosis test results from laboratories are being captured on various different databases and are not available on a central database. This needs to be corrected with compulsory centralized reporting of essential information from all laboratories testing for brucellosis. As a first step in the process, the importance of correctly and fully completed submission forms needs to be prioritised to enable laboratories to capture all the necessary and useful information.

Comments and further suggestions on the proposed details regarding d*iagnostic reporting format for laboratories, are invited.*

5.7.Establishment of a fair, equitable and sustainable "responsibility and funding system" for bovine brucellosis control

According to Section 11 of the Animal Diseases Act (Act No. 35 of 1984), it is the responsibility of the owner or manager of animals to take all reasonable steps to prevent the infection of their animals with any animal disease (and the spreading of such diseases to other animals or properties), as well as to eradicate such diseases from the animals. It should also be remembered that according to the Consumer Protection Act (Act No. 68 of 2008) it is the

responsibility of the seller to ensure the quality and safety of the animal or animal product that is being supplied. The discussion on who should bear the responsibility to organize and pay for bovine brucellosis testing and control thus needs to take these responsibilities of livestock owners into account. The input costs of a commercial livestock enterprise should ideally include all the essential animal health expenses in order for such an enterprise to be sustainable. Government expenditure is funded by general tax-payers' money and should thus not be used to subsidize the responsibilities of individuals but should be prioritized to cover essential spending that is in the public interest only. The public health importance of bovine brucellosis obviously creates an overlap of public and private interests that require clear definition of respective responsibilities. The imperative to clearly distinguish between public and private interests when considering funding options for animal and veterinary public health was also highlighted in the outcomes of the 2012 Performance of Veterinary Services (PVS) evaluation by the World Organization for Animal Health (OIE).

Given the above, it is proposed that the arrangement and payment for the routine compulsory testing at regular intervals should be covered fully by the livestock owner (unless such livestock owner is included as a beneficiary in another government scheme that includes the provision of veterinary services – see below). With regard to the costs for the regular testing of and application of control measures in infected herds it is proposed that government heavily subsidizes such, including the provision of veterinary or para-veterinary manpower to conduct the regular herd testing as well as the identification of and issuing slaughter permits for the test-positive animals. This would ensure that there is some distinction between public and private responsibilities while the use of private veterinary services in the control of animal diseases is maximised, the latter being another imperative identified during the PVS evaluation. Furthermore, it is envisaged that Government continues to pay for all laboratory testing of bovine brucellosis samples, as well as for government to expand its current commitment by undertaking to possibly fund the S19 brucellosis vaccine. This would maintain the advantage of full Government control over all brucellosis test results, as well as potentially increase the compliance with the compulsory heifer vaccination for brucellosis.

A fair, equitable and sustainable system that defines the responsibilities and funding obligations for bovine brucellosis testing and control measures needs to be developed.

> *We are thus inviting comments and suggestions on how to establish a fair, equitable and sustainable system that defines the responsibilities and funding obligations for the bovine brucellosis testing and control measures. It is suggested that the reasons and advantages for the proposals be expanded on in the comments sent to the Department so that the various options can be compared to each other.*

5.8. Establishment of an affordable and sustainable compensation system for slaughtered cattle that presents an incentive for the control of bovine brucellosis

With regard to compensation for cattle that test positive for bovine brucellosis and have to be slaughtered, a system that is affordable and sustainable needs to be developed. In general, it should be recognized that an animal infected with bovine brucellosis has no value other than slaughter value. Such an animal cannot be sold to anybody else for any purpose without spreading the disease, the milk of such animals poses a potential risk to human health and the

breeding value of such an animal is highly compromised because the disease affects reproductive performance. The only products of infected animals that can be salvaged without undue disease risk are the milk if it undergoes a rigorous pasteurization process and the meat if the animal is slaughtered at an abattoir to ensure that potentially infected carcass parts are condemned. The current bovine brucellosis control scheme does not prescribe the slaughter and destruction of infected animals but merely stipulates that infected animals should be slaughtered at a registered abattoir, with the owner thus benefitting from the slaughter value. While the current system thus covers the owner for the slaughter value of the animal, it is recognized that there are several issues that currently discourage some livestock owners from slaughtering their cattle that test positive for bovine brucellosis (as mentioned above) thus leading to further spread and delaying the control and eradication of the disease in infected herds. It is therefore acknowledged that as part of the required incentives for the slaughter of test-positive cattle, an amended compensation system may be required.

In order to find a solution to satisfactorily address the compensation issue, it should be noted that the compromised health status of infected animals together with the ultimate responsibility of the livestock owner for the health status of his or her herd makes it highly doubtful whether payment of full genetic value as compensation for slaughtered test-positive animals would promote the aims of controlling bovine brucellosis. In addition to probably making the system unaffordable, given the number of brucellosis infected cattle in the country, with such a genetic value compensation system government would effectively be providing an insurance scheme for livestock owners that may discourage them to take full responsibility for the introduction of disease into their herds. While it has been demonstrated that some level of compensation is necessary in order to incentivize livestock owners to report and eradicate the disease and to discourage attempts to hide infected animals, it has also been shown in several countries that the payment of too high a level of compensation actually frustrates the control efforts because there is no real incentive for farmers to protect the health status of their herds as introducing bovine brucellosis into the herd does not lead to a significant financial disadvantage. In extreme cases, farmers have even been demonstrated as having deliberately introduced the disease into their herds in order to benefit from an overly lucrative compensation pay-out. It is thus suggested that these dynamics should be borne in mind when proposing potential incentives.

The other issue regarding the affordability of a sustainable compensation system that has been mentioned concerns the source of the funding for such compensation. Traditionally in South Africa these funds have been sourced from Treasury only. In other countries, successful schemes have been operated that require industry and government to both contribute to a defined compensation fund, thus ensuring the availability of funds for this purpose, making compensation payments more sustainable and promoting the sharing of responsibility between government and the private sector for achieving the common animal and public health goals. The establishment of such a shared compensation fund that is administered by both government and private sector directors may go a long way to facilitate progress with regard to the required compensation for bovine brucellosis and thus the success of the proposed control measures.

> *Comments and further suggestions on the proposed details regarding the nature and organization of an affordable and sustainable compensation system for slaughtered cattle that presents an incentive for and promotes the goal of the control of bovine brucellosis are invited.*

5.9. Availability of manpower and other resources to test for bovine brucellosis and to apply the control measures

With reference to the above, different options exist and should be weighed up in terms of affordability and efficacy. CCS (Compulsory Community Service) of newly qualified veterinarians, an increase in employment of AHT's (Animal Health Technicians) and authorisation of private veterinarians can be viewed as options. Private responsibility for routine testing may increase government resources for the control efforts in infected herds. The transport costs involved in effectively covering the national herd for testing and to apply control measures need to be borne in mind, together with other resources and organization. Blood collection tubes, needles, ear-tags, etc. also need to be budgeted for.

Comments and further suggestions on the proposed details regarding the availability of manpower and other resources to test for bovine brucellosis and to apply the control measures are invited.

5.10. Opportunity to use the required identification of brucellosis vaccinated and tested cattle to pilot the proposed national AIRT

An Animal Identification, Recording and Traceability (AIRT) system does not exist on a national level and bovines are not subjected to movement control within the Foot and Mouth Disease Free Zone. The Veterinary Strategy has identified an official AIRT as one of the essential prerequisites for functional Veterinary Services in South Africa. Since compulsory identification and recording of data will be essential for all tested and vaccinated cattle, it will be an ideal opportunity to pilot the proposed AIRT system. Unique identification would also assist in policing and tracking of quarantined animals. One should bear in mind that any data base is only as good as the continuous capturing of accurate data.

Comments and further suggestions on the proposed details regarding the use of the required identification of brucellosis vaccinated and tested cattle, to pilot the proposed national AIRT, are invited.

5.11. Resources for rural assistance and general information and education campaigns

Brucellosis testing and disease control measures need to reach all communities throughout the country and the measures taken have to be consistent to ensure that bovine brucellosis control is being enforced in all sectors. The brucellosis control strategy may be prioritized in certain sectors, for example dairy cattle, and the control measures should obviously be adapted to suit the different farming realities in different sectors, for example dairy versus beef farming – but the principles of promoting food safety, animal production and human health need to be observed consistently.

All rural communities, subsistence farmers, emerging farmers, commercial farmers and all relevant industries have to be informed and educated on brucellosis and the control thereof. The public and the consumer also need to be made aware of brucellosis, especially pertaining to

the importance of pasteurizing dairy products. Farmers also need to be educated around the Consumer Protection Act (Act No. 68 of 2008) to inform them on their rights and obligations when purchasing or selling cattle or products that could potentially be infected with brucellosis.

Comments and further suggestions on the proposed details regarding resources for rural assistance and general information and education campaigns are invited.

5.12.Minimization of the risk of transmission at the Livestock-wildlife interface

The game industry within South Africa is rapidly growing and is generating a large economic turnover. Spill-over of bovine brucellosis from cattle to wildlife, and from wildlife back to cattle, needs to be assessed and addressed to optimise control of bovine brucellosis. However, this discussion document serves to focus specifically on brucellosis control measures in cattle. Control of brucellosis in wildlife (and small ruminants) will be addressed on a separate platform to facilitate progress.

Comments and further suggestions on the proposed details regarding minimization of the risk of disease transmission at the Livestock-wildlife interface from a cattle perspective are invited.

5.13.Incorporation of industry initiatives to control brucellosis

The new approach should make provision for recognition of voluntary standards of industry associations in the different industry sectors. One of the initial steps thus needs to establish the existing standards and programmes, as well as evaluate the efficacy and auditability of these standards. These standards may relate to any of the points as mentioned above.

Comments and further suggestions on the proposed details regarding the incorporation of industry initiatives to control brucellosis are invited together with the details of such initiatives that should be considered.

6. Outline of the consultation project

6.1. Process of consultation

South Africans are encouraged to participate in the discussion about the review of the bovine brucellosis control to ensure that we get a balanced view from all relevant stakeholders and role players. To facilitate this, we have developed this discussion paper which sets the context and guides you in the key areas that need to be addressed and prioritised.

All stakeholders are, therefore, requested to contribute inputs and comments on the proposed approach. **Please send the inputs organised under the relevant headings to facilitate the consideration thereof.** Your inputs will be used to refine the proposed approach and will aid in arriving at a mutual vision of the new bovine brucellosis policy framework.

You may wish to:

- comment on the nature, implementation and likely impacts of the reforms,
- provide qualitative and/or quantitative information to support your views,
- advise if any additional measures would complement the proposed topics above.

6.2. Milestones/ due dates

Consultation on this paper will be open for 60 days after the relevant publication date in the Government Gazette; however, we would prefer comments to be sent earlier. The DAH (Directorate: Animal Health of DAFF) will complete consultation on the detail of the reforms of the discussion paper in after this period. This will be followed by the drafting of a newly proposed bovine brucellosis policy document and legislation. Stakeholders will be given opportunity to provide inputs on the draft policy and legislation thereafter.

6.3. How to respond

Should you wish to provide a written statement or submission to the DAFF at this initial stage, please see contact details provided below. While submissions may be lodged electronically or by post, electronic submissions by e-mail would be preferred. For accessibility, please e-mail comments and inputs in Word or PDF format.

6.4. Contact details

For further information on this process and written comments, please contact the department at the following details:

Ms Petunia Masilela

Tel.: +27 12 319 7520

Fax: +27 12 319 7218

E-mail: PetuniaM@daff.gov.za

Senior Admin Clerk

The Director

Directorate: Animal Health

Department of Agriculture

Private Bag X138

PRETORIA

0001

Physical address:

G29 Delpen Building

Corner of Annie Botha Avenue and Union Street

Riviera

Pretoria