

20th August 2026

Dr Mpho Maja

Director: Animal Health

Department of Agriculture

Private Bag X250

PRETORIA 0001

(electronically mailed)

Dear Dr Maja

**REQUEST FOR THE TECHNICAL BASIS AND RECONSIDERATION OF THE REVISED VETERINARY HEALTH
CERTIFICATION FOR BEEF TAILS FROM ARGENTINA**

The Association of Meat Importers and Exporters (AMIE) writes at the request of its membership to seek formal clarity on the basis upon which the Directorate: Animal Health determined the new certification requirements applicable to beef tails (oxtail) imported from Argentina. The revised requirements have significant commercial consequences and, on the information presently available to industry, appear to extend materially beyond both the limited amendment originally requested and the relevant international standards.

AMIE recognises and supports the Department's statutory responsibility to protect South Africa's animal-health status. Our concern is not with that mandate, but with the absence of a communicated, commodity-specific scientific basis for the additional conditions and with their proportionality to the risk presented by beef tails from WOA-recognised Argentine zones.

Background and scope of the original request

As recorded in AMIE's correspondence of 22 April 2026, the issue presented to the Department was narrow. Following the first detection of scrapie in sheep in Argentina during 2026, the Argentine authority could no longer certify a country-freedom declaration contained in the certificate then in use. Scrapie is a transmissible spongiform encephalopathy of sheep and goats; it is not a disease of cattle. The request was therefore limited to removing the ovine-scrapie declaration from a certificate governing bovine products.

The request did not seek a reopening of the established requirements for foot-and-mouth disease (FMD), bovine spongiform encephalopathy (BSE), vesicular stomatitis (VS), regionalisation, or the underlying market-access framework. Indeed, the joint South Africa-Argentina engagement of 29 April 2026 publicly described the work as the readjustment of sanitary certification following the appearance of scrapie, with the objective of facilitating market access while maintaining international sanitary standards.

Executive Committee: M. Luff (Chairman), C. Dorfling (Vice- Chairman), G. Hendricks, K. Mestdag, R.Thomas.

P. Matthew (Chief Executive Officer)

AMIE understands that, while the Directorate accepted the removal of the scrapie declaration, the revised approach also introduced new FMD-, BSE- and VS-related conditions and separated the existing international veterinary certificate into two models: one for bone-in beef and offal sourced from the FMD-free zone without vaccination, and another for boneless beef sourced from the FMD-free zone with vaccination. AMIE is advised that all Argentine establishments currently authorised to export to South Africa are situated in the latter zone. The practical effect is therefore to preclude exports of beef tails and other bone-in/offal products from the approved establishments.

Foot-and-mouth disease

The official evidence presently available does not explain the need for this distinction. WOA's 2026 Resolution No. 19 recognises Argentine FMD-free zones both with and without vaccination. SENASA's official account confirms that these recognised zones collectively cover the national territory; that Argentina's last FMD outbreaks occurred in February 2006 and were closed in March 2006; and that the country reconfirms its status annually through established vaccination, movement-control, identification and surveillance systems. An English summary of the relevant SENASA material is included in Annexure A.

Article 8.8.23 of the WOA's Terrestrial Animal Health Code specifically addresses fresh meat and meat products from an FMD-free country, zone or compartment where vaccination is practised. It requires appropriate origin, approved slaughter and favourable ante- and post-mortem inspection, and in the case of ruminants the exclusion of the head, pharynx, tongue and associated lymph nodes. It does not prescribe deboning as a condition for this category of origin.

Accordingly, a requirement that bone-in beef and offal may originate only from an Argentine zone where vaccination is not practised appears to exceed the applicable WOA's recommendation. South Africa may adopt a higher level of protection where justified, but industry requires the scientific evidence and risk assessment demonstrating why Article 8.8.23 is insufficient for beef tails and why a less trade-restrictive measure would not achieve the Directorate's stated level of protection.

This request is especially important in the context of the scientific cooperation already established between the two countries. South Africa's own official FMD report of 30 April 2026 recorded 1,611 open outbreaks, while South Africa has procured Argentine FMD vaccines and entered a 2026–2028 technical cooperation work plan with Argentina. AMIE does not raise South Africa's epidemiological circumstances as a basis for lowering legitimate safeguards. Rather, the bilateral reliance on Argentine expertise underscores the need for a transparent and consistent explanation when recognised Argentine sanitary status and WOA's trade recommendations are treated as insufficient for this commodity.

Bovine spongiform encephalopathy

WOA's 2026 Resolution No. 23 lists Argentina as a country presenting a negligible BSE risk. Article 11.4.11 of the Terrestrial Code sets out the certification recommendations for fresh meat and meat products from countries, zones or compartments presenting negligible or controlled BSE risk. For bovines born and kept in a negligible-risk country, the relevant recommendations concern animal identification, favourable ante-mortem inspection and origin in a negligible-risk population.

The additional declaration reportedly required by the Directorate concerning the removal and destruction of specified risk materials is not a general WOA's condition for fresh meat originating from a country with negligible BSE risk. The restrictions in Article 11.4.15 concerning commodities with the greatest BSE infectivity apply to undetermined-risk origins and, in specified circumstances, controlled-risk origins. AMIE therefore requests the precise risk pathway and scientific basis for imposing the additional declaration on Argentina notwithstanding its officially recognised negligible-risk status.

Vesicular stomatitis

AMIE further understands that the revised certificate requires Argentina to be free from vesicular stomatitis. Argentina treats VS as a notifiable disease and reports sporadic occurrence; it is therefore not able to certify country freedom. VS is not included in the current WOAHP list of terrestrial animal diseases in Chapter 1.3 of the Terrestrial Code. The available WOAHP technical description identifies the principal transmission pathways as direct exposure through damaged skin or mucosa and arthropod vectors, with virus associated primarily with saliva, vesicular exudate and lesion epithelium.

Against that background, the Directorate is requested to provide the commodity-specific pathway analysis demonstrating that legally slaughtered, inspected and processed beef tails present a material risk of introducing VS into South Africa, and to explain why country freedom rather than a proportionate product- or establishment-based condition is required.

International principles and the need for written reasons

The WTO Agreement on the Application of Sanitary and Phytosanitary Measures recognises a Member's right to protect animal health. It also requires SPS measures to be based on scientific principles and sufficient evidence; to be based on international standards where they exist, unless a higher measure is scientifically justified; to rest on an appropriate risk assessment; and not to be more trade-restrictive than required. Article 5.8 further provides for an explanation where a measure constrains exports and is not based on the relevant international standard.

The fact that no scientific justification or risk assessment has yet been disclosed to AMIE does not, of itself, establish that none exists. It does mean, however, that the decision presently appears to industry to lack a transparent scientific foundation and that affected businesses cannot understand, test or respond to the basis for a measure that has effectively interrupted an established trade flow.

AMIE's formal request

AMIE accordingly requests that the Directorate provide the following in writing:

1. Decision process and reasons. A detailed account of the process by which the revised certificate conditions were developed, reviewed and approved, including why a request limited to removing an ovine-scrapie declaration triggered a wider reconsideration of FMD, BSE, VS and regionalisation requirements.
2. Scientific evidence and risk assessments. The scientific literature, data, pathway analyses, import-risk assessments and expert advice relied upon for each additional condition, with particular reference to the risk presented specifically by beef tails.
3. International standards. An explanation of why the protections in WOAHP Articles 8.8.23 and 11.4.11 were considered insufficient; which alternative WOAHP provisions were applied; and the scientific justification for any requirement that provides a higher level of protection than those standards.
4. Regionalisation and sanitary status. The reasons for not accepting exports of bone-in beef and offal from Argentina's WOAHP-recognised FMD-free zone with vaccination, together with the criteria applied to Argentina's recognised negligible BSE risk.
5. Vesicular stomatitis. The risk pathway and proportionality analysis supporting country freedom as a condition for beef tails, including consideration of less trade-restrictive product-, establishment- or consignment-based measures.
6. Reconsideration and interim approach. An urgent reconsideration of the revised models and, pending completion of a transparent technical review, consideration of an interim certificate based on the previously operative model amended only to remove the inapplicable scrapie declaration.

Given the continuing commercial impact on importers, exporters and South African consumers, we would appreciate your substantive written response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Matthew', with a stylized flourish underneath.

Paul Matthew

Chief Executive Officer

Association of Meat Importers and Exporters (AMIE)