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TO: **The Minister for Health** Date: 15 April 2020

The Honourable Dr Zwelini Mkhize

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Dear Minister

WILDLIFE TRADE AND CORONAVIRUS

Introduction

We act for the EMS Foundation, a registered non-profit organisation concerned among other things with the protection of wild animals.

Our client wrote to you on 14 June 2019, 3 March 2020 and 7 April 2020 regarding the dangers to human health of the legal trade in lion bones. Copies of those letters, to which our client has not had a response, are attached for ease of reference.

Our client's letter highlighted the dangers to abattoir workers, to local communities who are often given the meat from lions to eat, to those involved in manufacturing the traditional Asian medicines of which lion bone is a component, as well as the ultimate consumers of the medicines.

As you are aware, there is now ample evidence that the present COVID-19 pandemic was caused by the zoonotic coronavirus, the origin of which has been confirmed to be a wildlife market in Wuhan, China. There is consensus among infectious disease experts that increased contact between wild animals and humans has increased the risk of dangerous viruses spilling over from animals to human. According to the World Health Organization, almost three-quarters of all epidemics in recent decades have spilled over from animals. Pandemics are also occurring more frequently.

Accordingly, a serious investigation into the safety of wildlife products for human consumption is now even more urgent. All of the information available on the current pandemic suggests that the urgent closure of all facilities where wildlife products are handled is more than justified as a precautionary measure pending the outcome of such an investigation.

In China, a temporary ban on wildlife markets has been imposed with indications that it may become permanent. It is also reported that Vietnam's prime minister has asked the country's agriculture ministry to draft a directive to stop illegal trading and consumption of wildlife over fears it spreads disease.

Your department has a mandate in terms of the Foodstuffs, Cosmetics and Disinfectants Act to regulate food safety in South Africa.

In terms of section 2(1)(b)(1) of that Act, you have the power to prohibit by regulation the sale or manufacture of any foodstuff

"which is contaminated, impure or decayed, or is, or is in terms of any regulation deemed to be, harmful or injurious to human health."

You also have wide powers to close down food premises and prohibit the handling and transportation of food that may constitute a health hazard under the *Regulations governing*

general hygiene requirements for food premises and the transport of food (GNR 918 of 30 July 1999).

Cooperative governance

Since a proper response to the public health risks of the wildlife trade requires a coordinated approach between officials responsible for wild animals, food safety and public health, cooperative governance on this issue is key. We attach hereto letters sent simultaneously to DEFF and to the Department of Agriculture, Land Reform and Rural Development setting out actions which our clients believe they should be taking urgently to safeguard human health.

Conclusion

In light of serious health risk that the wildlife trade from South Africa poses to:

1. abattoir workers in South Africa; and
2. consumers of wildlife products in South Africa and globally

and in order for your Department to fulfil its mandate in terms of ensuring the safety of foodstuffs we suggest that it must immediately investigate measures to restrict the trade in wildlife products from South in terms of the legislation outlined above. Such measures should include at the very least a ban on the human consumption of wildlife products within South Africa and a ban on the export of products deriving from wild animals for human consumption.

We look forward to hearing from you as soon as possible.

Yours sincerely



CULLINAN & ASSOCIATES INC.

per: SD KVALSVIG