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Planning, Monitoring and Evaluation
REPUBLIC OF SOUTH AFRICA



agriculture,
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SOCIO-ECONOMIC IMPACT ASSESSMENT SYSTEM (SEIAS)

INITIAL IMPACT ASSESSMENT TEMPLATE (PHASE 1)

2018

The Initial Impact Assessment [Draft Animal Welfare Bill]

The Department of Agriculture, Land reform and Rural Development included Animal Welfare as a pillar in the Veterinary Strategy for South Africa of 2015. The animal welfare outcomes of the Veterinary Strategy would position South Africa favourably (locally and internationally) with regards to impact on commercial and social sectors where animals are involved.

As a step towards fulfilling the objectives of the Animal Welfare Pillar of the Veterinary Strategy, a comprehensive and up-to-date animal welfare bill and regulations need to be developed. The national strategic benefits expected to be derived from the modernised animal welfare legislation in the country include:

- i. better animal productivity and health;
- ii. better food safety and security;
- iii. better ability to access international markets for animals and animal products, which are desired outcomes of the National Development Plan (NDP) and Agricultural Policy Action Plan (APAP)

This Initial Impact Assessment aims to motivate that the draft animal welfare bill is the preferred intervention to address the animals' welfare challenges at all levels of human-animal interface in South Africa while evaluating alternative interventions.

1. The problem/ Theory of Change

1.1. What is the **social or economic problem** that you are trying to solve?

South Africa is a member of the World Organisation for Animal Health (World Organisation for Animal Health), which has recommended animal welfare standards for member states. The World Organisation for Animal Health recommends that member states must have primary legislation (Acts) secondary legislation (regulations) and tertiary legislation (policies) on animal welfare.

There are three existing laws dealing with animal welfare in South Africa:

- Animals Protection Act (Act No.71 of 1962),
- Animal Matters Amendment Act (Act No.42 of 1993) and
- Performing Animals Protection Act (Act No.24 of 1935).

The enforcement of these three pieces of legislation is primarily vested with the National Societies for the Prevention of Cruelty to Animals as provided for by the Societies for the Prevention of Cruelty to Animals Act, 1993.

These laws and regulations were subjected to an assessment by the World Organisation for Animal Health and the 2012 report from the exercise concluded that current animal welfare legislation in South Africa is out-dated and not in harmony with current World Organisation for Animal Health standards.

Animal welfare is a fast growing science that has emotional, economic and potential political aspects locally, regionally and internationally. The World Organisation for Animal Health's welfare standards are recognised and used for international trade under World Trade Organisation (WTO).

Recent and on-going international developments in animal welfare place more thrust to promotion of good animal welfare, in addition to the previous focus on defining animal welfare offenses or infringements. The promotion of animal welfare is associated with setting animal welfare standards for various circumstances in which animals interface with humans and creation of mechanisms by which compliance with standards can be assessed and verified.

The existing legislation dealing with animal welfare in South Africa does not allow for the creation, monitoring and evaluation of animal welfare standards as envisaged by the World Organisation for Animal Health. Animal welfare standards are recommended at all levels of animal-human interface from birth / hatching through growing / rearing, conveyance and when animal lives are terminated either by slaughter for meat or killing for whatever other reason.

Consequently, South Africa cannot demonstrate 'animal welfare equivalency' by way of animal welfare standards, audit reports and other animal welfare assessment outcome findings or reports when needed is disadvantaged in the following ways:

- Compromised access to international markets for animals and animal products
- Compromised animal productivity as poor welfare can affect growth efficiency;
- Lose of 'niche markets' keen on paying high premiums for 'good welfare assured' animals and animal products;

- Higher veterinary care costs for management of animal health issues preventable by provision of good animal welfare; and
- Disputes with non-profit organisations in the animal welfare space, among others.

There is lack of promotion of good animal welfare: disease prevention and veterinary treatment, appropriate shelter, management, nutrition, humane handling and humane slaughter/killing.

What are the main causes of the problem? That is why the problem arise and why does it persist?

Identified Problem	Main Causes of the Problem	Why the problem arises and why does it persist?
<p>Animal welfare legislation is not harmonised to World Organisation for Animal Health's recommendations. This has socio-economic and political consequences such as vilification of certain cultures, court cases, delayed or cancelled animal trade deals, 'inferior' prices for animals / products, niche markets.</p>	<p>The existing pieces of legislation are out-dated, fragmented and unable to cater for contemporary World Organisation for Animal Health's animal welfare recommendations.</p>	<p>The South African animal welfare legislation remained stagnant over time while World Organisation for Animal Health animal welfare standards evolved and progressed. The punitive initial inclination of the existing laws still exists even when circumstances have changed which render such laws ineffective (not fit for purpose).</p>
<p>Animal welfare implementation is</p>	<p>Currently legislation focuses on defining animal welfare</p>	<p>The Animals Protection Act, 1962, has a title that suggests humans have an</p>

<p>inferior as compared to other animal matters such as animal health and disease prevention programmes</p>	<p>offences, identification of 'offenders' and punishment of the 'offenders'. There are a number of animal welfare legal cases being prosecuted by the National Council of Societies for the Prevention of Cruelty to Animals.</p>	<p>inherent intention to harm animals. Instead of informing how to promote and sustain good animal welfare, the current law focuses negatively on what not do to avoid punishment. South Africans are not encouraged to derive better social, economic and cultural outcomes from their animals from improving welfare.</p>
<p>Perceived monopoly in the animal welfare organisation space arising from the Societies for the Prevention of Cruelty to Animals Act, 1993.</p>	<p>The Societies for the Prevention of Cruelty to Animals Act, 1993, 1993 vests enforcement of all animal welfare legislation in South Africa with organisations registered with the National Council of Societies for the Prevention of Cruelty to Animals board. Anyone else who intends to work in the animal welfare space has to be registered with the Non-Profit Organisation if they do not want to register with the National Council of Societies for the Prevention of Cruelty to Animals board, creating a legalised monopoly.</p>	<p>The Societies for the Prevention of Cruelty to Animals Act, 1993, 1993 refers to the Animals Protection Act, 1962, Animal Matters Amendment Act, 1993, Performing Animals Protection Act, 1935 and others as 'Associated-Acts' which gives the National Council of Societies for the Prevention of Cruelty to Animals board exclusive legal preference to enforcement of these laws in the country. Diversity of opinions, understanding and reaction to matters related to these 'Associated Acts' is thus hindered, which is detrimental to fair application of the laws for animal welfare in the country.</p>

1.2. Whose behaviours give rise to the problem, and why does that behaviour arise? Remember that several groups including some in government may contribute to the identified problem. Their behaviour may arise amongst others because the current rules are inappropriate; because they gain economically from the behaviour; or because they are

convinced that they are doing the right thing. Identifying behaviours that cause the problem should point to the behaviours that must be changed in order to achieve the desired solution.

Identified Problem	Behaviour giving rise to the identified problem	Groups whose behaviour give rise to the identified problem?	Why does the behaviour arise?
<p>Animal welfare legislation is not harmonised to World Organisation for Animal Health's recommendations. This has socio-economic and political consequences on the country such as vilification of certain cultures, court cases, delayed or cancelled animal trade deals, 'inferior' prices for animals / products, niche markets.</p>	<p>Failure to identify legislative that directly impact on animal welfare and engage on processes for advancement in line with scientific and international trends.</p>	<p>The Department of Agriculture, Land Reform and Rural Development.</p>	<p>Lack of / incorrect custodianship of the Acts. No facts point to the reasons but possible speculative reasons could be: lack of capacity / information / interest / ignorance, fear of change, animal welfare being a sensitive subject that's better left alone.</p>
	<p>Failure to appoint dedicated personnel driving adaption of existing legislation in line with international trends.</p>		<p>Lack of budget could explain lack of appointment of sufficient dedicated personnel to manage animal welfare matters.</p>
<p>Lengthy processes involved in the updating of existing legislation</p>	<p>Failed to alert parliament and the Department of Agriculture on the need to improve the out-dated state of</p>	<p>Animal welfare organisations</p>	<p>Lack of communication structures on animal welfare matters between the government and animal welfare organisations</p>

	animal welfare laws in the country.		
There is lack of standards attributable to the Department of Agriculture and standards that seek to promote animal welfare are private and commercialised.	The Department of Agriculture has not created and or availed standards to promote animal welfare.	National and provincial Department of Agriculture	No law in the country compels creation of essential animal welfare standards freely available and applicable to all animal owners.
			There are no animal welfare standards available for free to the animal owners and respective animal industries.
	The South Africa Bureau of Standards (SABS) requested by the private sector has created animal welfare standards available at a cost.	The South African Bureau of Standards and private entities that saw commercial value and created the private animal welfare standards.	Innovative private individuals saw and used an opportunity availed by the lack of free essential animal welfare standards for commercialisation.
The National Council of Societies for the Prevention of Cruelty to Animals only cater for those	The Societies for the Prevention of Cruelty to Animals Act, 1993 requires those interested in the	Parliament, Department of Agriculture, National Council of Societies for the Prevention of Cruelty to Animals board,	Membership to a private board is a prerequisite to ability to enforce animal welfare legislation. Membership to private

organisations that register with their board	enforcement of 'Associated Acts' to be registered with the National Council of Societies for the Prevention of Cruelty to Animals board (a private board).	Competition Commission and civil society by not addressing the monopolistic situation and taking remedial action.	boards / groupings should be voluntary.
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1.3. Identify the major social and economic groups affected by the problem, and how are they affected. Who benefits and who loses from the current situation?

Identified Problem	Groups (Social/Economic)	How are they affected by the identified problem?	Are they benefitting or losing from the current situation?
Animal welfare legislation is not harmonised to World Organisation for Animal Health recommendations.	Department of Agriculture, Land reform and Rural Development.	Inability to achieve NDP and APAP goals	Losing on opportunities to secure trade agreements with interested countries
		International trade negotiations for animals and products are compromised.	
	Sub-optimal economic growth contributions from the livestock sector.		
	Export certifying state veterinarians.	Animal welfare related export certification is done without evidence.	Losing on opportunities to attract potential traders who can apply for export of products and therefore generation revenue to the state

	The National Council of Societies for the Prevention of Cruelty to Animals board	The National Council of Societies for the Prevention of Cruelty to Animals board gains financially from membership fees and donations	Benefitting from the donations and other forms of funding received in favour of cases to be prosecuted
	Animal owners	Local, international & niche markets access impediments for animal welfare related reasons.	Losing on the financial growth with their animals not acceptable to compete on the export market due to lack of compliance to international welfare requirements
	Consumers	Animal and animal products choices based on animal welfare criteria are limited.	Losing on the freedom to choose preferred products guided by how the welfare measures were implemented on farms
Promotion of animal welfare is inferior	Animal owners	Quantity, quality and safety of animals and products are affected by animal welfare.	Losing on opportunities for their animal products to be included on the market
	Security companies	Security industry animals' welfare requirements become arbitrary.	
	Performing animals industry (filming,	Performing animals' welfare	

	advertisement, zoos etc.)	requirements become arbitrary	
	Consumers	Animal welfare affects quality and safety of animals and products.	
	Treasury	Lower revenue collection (taxes) due to productivity and prices.	
The National Society for the prevention of cruelty to animals only cater for those organisations that register with their board	National Council of Society for the Prevention of Cruelty to Animals board	Continue to grow membership from current and new registrants.	Benefitting from the donations and other forms of funding received in favour of cases to be prosecuted
	National Council of Society for the Prevention of Cruelty to Animals' members / affiliated animal welfare organisations	These members depend and abide by National Council of Society for the Prevention of Cruelty to Animals board's animal welfare ideologies for membership.	Losing on the freedom to operate independently from the National Council of Societies for the Prevention of Cruelty to Animals
		They get a share of funding from the National Council of Society for the Prevention of Cruelty to animals board.	Benefitting by shares of the funds generated through the success of legal cases which in turn attract funders.

	-Animal welfare organisations not affiliated to the National Society for the Prevention of Cruelty to Animals	They do not get the recognition by National Council of Societies for the Prevention of Cruelty to Animals board.	Losing on the opportunities to independently implement welfare measures since the law does not make reference to them.
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1.4. Which of the five top priorities of the State- that is, Social Cohesion, Security, Economic Growth, Economic Inclusion (Job Creation and Equality) and a Sustainable Environment is/ are negatively affected by the identified problem?

National Priority	How is the priority negatively affected by the identified problem?
1. Social Cohesion	<p>Animal welfare is viewed differently by different people resulting in possible disruption of social cohesion. The difference in animal welfare perceptions arises from a lack of common understanding and standards.</p> <p>Perceived threat from animal welfare organisations & government officials when communities seek animal health services.</p>
2. Security (Safety, Financial, Food, Energy and etc.)	<p>Poor farming practices lead to provision of animals and animal products of a low standard. This causes undermining by trade partners, which negatively impacting the economic status of the country.</p>
3. Economic Growth	<p>Animal welfare considerations are increasingly vital for local and international trade. Presence or absence of enforceable animal welfare legislation can make or break trade negotiations.</p> <p>Collapse of trade deals due to animal welfare matters has cascading negative economic impact through the entire animal value chain.</p>

4. Economic Inclusion (Job Creation and Equality)	<p>Undermined: Potential animal welfare inspectors are not employed presently.</p> <p>An entirely new animal welfare industry can arise (specialist and other groups to ensure animal welfare)</p>
5. Environmental Sustainability	<p>Undermined: Over population and challenges with waste management and disease control. Lack of attention to animal populations result in overpopulation and disease outbreaks directly impact on waste disposal measure in terms of disposing dead animals</p>

2. Options

2.1. List at least three options for addressing the identified problem, including (a) your preferred proposal, and (b) an option that does not involve new or changed regulation (baseline or existing option)

- Develop a new Animal Welfare Act (preferred) – feeds into the National Development Plan & Agricultural Development Plan
- Retain the current legislation as is, improve enforcement and improve animal welfare education (not desirable)
- Amendment of current legislation:
- Performing Animals Protection Act, 1935 (Act No. 24 of 1935),
- Animals Protection Act, 1962 (Act No. 71 of 1962),
- Animal Matters Amendment Act, 1993 (Act No. 42 of 1993),
- Societies for the Prevention of Cruelty to Animals Act, 1993 (Act No. 169 of 1993) and associated regulations. This is not a preferred option because this will retain the fragmented animal welfare legislation in the country. Amendments of some of these Acts have been made already and the outcomes were still deficient laws. A new law that incorporates the good in the existing pieces of legislation while eliminating the bad is ideal. The new act will repeal the existing legislative framework.

2.2. Are the proposed options linked to other existing government laws or regulations and what are the gaps / limitations of those exiting ones to address your identified problems?

Government legislative prescripts	Custodian Department / units within your department	Areas of linkages	Limitations of the existing prescripts
Performing Animals Protection Act, 1935 as amended	Department of Agriculture, Land Reform and Rural Development	Registration of persons training animals, facilities and animals in security and filming industries.	<p>'Performing Animals' in this Act means guarding, filming and exhibition, which is very narrow.</p> <p>The Act only requires registration of person, facilities and performing animals but no obligations for good welfare by the persons at these facilities.</p>
Animals Protection Act, 1962	Department of Agriculture, Land Reform and Rural Development	Practices infringing on animals' welfare are defined / criminalised.	These Acts only speaks to possible animal welfare infringements, not what to do to improve welfare (welfare promotion is a major proposal of the Animal Welfare Bill).
Animal Matters Amendment Act, 1993	Department of Agriculture, Land Reform and Rural Development	An amendment of the Animals Protection Act.	DAFF has custody but no authority to enforce. The authority is with the National Council of Society for the Prevention of Cruelty to Animals.

Societies for the Prevention of Cruelty to Animals Act, 1993, 1993	National Council of Societies for the Prevention of Cruelty to Animals	Provides for the registration / authorisation of animal welfare organisations and peace officers (Societies for the Prevention of Cruelty to Animals inspectors) through the National Council of Societies for the Prevention of Cruelty to Animals board.	The Societies for the Prevention of Cruelty to Animals Act, 1993 creates a private entity (National Council of Societies for the Prevention of Cruelty to Animals) to register Societies for the Prevention of Cruelty to Animals to enforce laws ('Associated Acts'). (Registration of entities working in the animal welfare space should be done by the DAFF – an Animal Welfare Bill proposal).
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2.3. What social groups would gain and which would lose most from each of the three or above options? Consider specifically the implications for the households earning under R 7000 a month; micro and small business; black people, youth and women; and rural development.

Option	Main Beneficiaries	Main Cost bearers
a) Write a new Animal Welfare Act (preferred)	Everyone (animal owners, security companies, military, police, circus, traders, etc.) who owns keeps or uses animals (better regulated systems with clear guidelines on welfare as they keep and use their animals).	Department of Agriculture, Land Reform and Rural Development. Animal owners who register and change their current systems to accommodate the new legislation.

b) Retain the current legislation as is, improve enforcement and improve animal welfare education	Enforcers of existing animal welfare legislations (SPCAs) (donations and other revenue associated with enforcing the current laws).	Animal owners, keepers and users (penalties / fines if guilty when charged by SPCAs for animal welfare infringements).
	Persons and facilities licensed under PAPA (charge fees for services under existing laws).	PAPA-licensed persons and facilities (compliance and noncompliance costs under existing laws).
c) Amendment of current legislation	DAFF has custody but no authority to enforce. The authority is with the National Council of Societies for the Prevention of Cruelty to Animals.	Animal owners who register and change their current systems to accommodate the new legislation. Department of Agriculture, Land Reform and Rural Development

2.4. For each option, describe the possible implementation costs, compliance costs and the desired outcomes, listing who would bear the costs or, in case of the outcomes, enjoy the benefits.

Option	Implementation costs	Compliance costs	Desired Outcomes (Benefits)
a) Write a new Animal Welfare Act (preferred)	Recruitment of additional employees to deal with animal welfare matters at national and provincial government levels.	Registration fees payable by animals' owners and facilities owners.	<ul style="list-style-type: none"> Modern and standardised animal welfare standards / practices which are freely available to the public.
	Travel and training costs.	Education/training.	
	Awareness / adverts.		

	Legal costs (in the event of litigation).	Legal costs (fines, hire of lawyers).	<ul style="list-style-type: none"> Registration and control of persons / organisations in the animal welfare sector under the Department of Agriculture, Land Reform and Rural Development.
b) Retain the current legislation as is, improve enforcement and improve animal welfare education	Recruitment of additional personnel by Department of Agriculture, Land Reform and Rural Development and the National Council of Societies for the Prevention of Cruelty to Animals to educate society and enforce animal welfare.	Performing Animals Protection Act, 1935 licensing and National Council of Societies for the Prevention of Cruelty to Animals board membership fees	Improved awareness and compliance to existing animal welfare legislation.
	Subsistence & Travel costs for facilities inspections and audits.		
	Legal costs for cases against offenders.		
c) Amendment of current legislation	Recruitment of additional employees to deal with animal welfare matters at national and provincial government levels.	Registration fees payable by animals' owners and facilities owners.	Modern and standardised animal welfare standards except that the legislation will remain fragmented

2.5. Based on the above table on costs and benefits, describe how different options would contribute to or detract from the national priorities. Remember this is a think-tool, so explore the issues freely.

Priority	Option 1	Option 2	Option 3
1. Social Cohesion	Offers a platform for equal recognition of all stakeholders based on similar animal welfare standards	Retains the existing deficiencies whereby societies view animal welfare enforcement negatively for cultural, religious and lack of information.	This may achieve what Option 1 delivers but is likely more fractious.
2. Security (Safety, Financial, Food, Energy and etc.)	Animal welfare standards in South Africa acquire a state of equivalence to international standards for trade. Food safety and security will most likely also improve. There will an initial capital investment cost associated with the improved welfare standards	Retains the existing deficiencies.	This may achieve what Option 1 delivers but is likely more fractious.
3. Economic Growth	The state of equivalence of South African animal welfare to international	Affects trade, consequently stifling economic	This may achieve what Option 1 delivers but is likely more fractious.

	standards will improve trade prospects and improve revenue (taxes) from better prices.	growth contribution from the animal industry.	
4. Economic Inclusion (Job Creation and Equality)	Jobs will be created, improving the economy. Animal welfare based consumer / market segregation based on welfare will be bridged.	More jobs may be created for educational and enforcement purposes.	This may achieve what Option 1 delivers but is likely more fractious.
5. Environmental Sustainability	Farming practices are likely to improve , reducing possible wastage of resources.	Retains the status quo (over grazing and degradation of the environment).	This may achieve what Option 1 delivers but is likely more fractious.

2.6. Describe the potential risks that could threaten implementation of each option and indicate what can be done to mitigate the identified risks.

Option	Potential Risks	Mitigation Measures	Comments
a) Write a new Animal Welfare Act (preferred)	<p>Politics:</p> <ul style="list-style-type: none"> The need for improved animal welfare provisions may get misread as a drive to prioritise animal welfare over human needs. 	Explain the need for updated animal welfare laws along Veterinary Strategy, Agricultural Development Plan and National Development Plan strategic objectives.	This is the preferred option. It is easier to achieve, inclusive and comprehensive. International trade which delivers foreign currency can be promoted.
	<p>Funding / resources:</p> <ul style="list-style-type: none"> Lack of / insufficient funding can impact on development and 	Make a budget for development and implementation stages. Support from the World Organisation for Animal	Care must be taken to avoid hijacking of the original agenda and objectives by funders.

	implementation processes.	Health or similar bodies can be requested.	
	<p>Cultural / societal norms and practices:</p> <ul style="list-style-type: none"> • Cultural norms and practices relating to ownership and use of animals are diverse leading to potential cultural adversities. 	Package animal welfare as evolving with values evolution, socio-economic development and global value systems. Our laws must accommodate all and allow consolidation with time (developmental).	Extreme views on animal welfare issues are a very likely scenario. A law that criminalises the majority has to be guarded against. Exemptions may also need to be included.
	<p>Animal rights proponents:</p> <ul style="list-style-type: none"> • Animal rights proponents who do not believe in human usage of animals may challenge processes. • Agent provocateurs may get hired to exaggerate certain agendas in the Animal Welfare Bill drafting. 	<p>Distinct separation of animal welfare from rights is needed to clear potential grey areas that may lead to ambiguity or confusion.</p> <p>Leadership of processes need knowledge and ability to handle meetings and situations ensuring that planned outcomes are achieved.</p>	Some responsibilities may be assigned to NPOs and private entities to ensure they are involved and thus understand processes and implementation expected outcomes.
b) Retain the current legislation as is, improve enforcement and improve	Lack of incentive to enforce compliance.	Make animal welfare an item of the Annual Performance Plan	Not a preferred option. Existing laws do not have animal welfare equivalency to international standards. Efficient or robust enforcement of
	Funding for development and production of educational materials.	<p>Make a comprehensive budget.</p> <p>Ask for support from the World Organisation for</p>	

animal welfare education		Animal Health or similar bodies.	out-dated and sub- standard laws is of no value.
	Trust issues in the communities	Use champions of social facilitation to build trust in communities.	
c) Amendment of current legislation.	Amendment of at least four Acts is fractious and cumbersome given different domains and agendas they cover.	It will be best to leave this entire task to lawyers.	Those offered special privileges by the Societies for the Prevention of Cruelty to Animals Act, 1993 are unlikely to cooperate with its amendment.

At this point, if you think the analysis points to a more useful or stimulating set of options, revise the SEIAS. You may find that you would like to combine some of the options, or that the process of discussion around the options has generated ideas that are better than your original ideas. Ideally, the three options considered should all be good ideas-that provides the best test for the final strategy adopted.

3. Summary

3.1. Based on your analysis, as reflected in the discussion of the three options above, summarise which option seems more desirable and explain?

The most desirable option is a) Write an Animal Welfare Bill. It is preferred because it is the least complicated means to develop a simplified modern Animal Welfare Act supported by very detailed regulations, unlike the existing Acts. The Animal Welfare Bill will repeal the existing Acts while incorporating the good in the existing Acts either directly into the Act or as regulations.

3.2. What specific measures can you propose to minimise the implementation and the compliance costs of your preferred option, to maximise the benefits?

The Departments of Agriculture at national and provincial levels will try to utilise existing personnel resources to develop the new legislation. While additional personnel will be required to implement the new legislation internal capacity will also be used.

Compliance costs will be kept at the barest minimum by using the government tariffs committees to set standard fees. During the inception phase, waivers on compliance fees can be issued or a moratorium on charging compliance fees can be requested to ensure maximum compliance.

- 3.3. What are the main risks associated with your preferred option, and how can they best be managed?

The exercise could be time consuming and probable high costs of nationwide public consultations. Regional public consultation meetings can be done copying from recent exercises by parliamentary committee of land expropriation as a means to minimise costs and time.

Politicisation of animal welfare could occur. To minimise the impact of such an occurrence, animal welfare would be handled as an evidence-based science.

- 3.4. What additional research should you do to improve your understanding of the costs and benefits of the option adopted?

The current clientele to the existing legislation covers a wide range of specialists who are not only animal owners or agricultural specialists. Research can be done to identify stakeholders with financial backgrounds for inclusion in committees engaged with the development processes.

Review of previous legislation development processes for comparison of identified process flow and what/ how resources were utilised.

Benchmarking can be set for processes flow and this will limit the extend of the activities as will be guided by set time frames, set costs estimates and reduction of processes that does not guarantee progress.

For the purpose of building SEIAS body of knowledge please complete the following:

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