



# Liberty Fighters Network

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Date: 21 August 2025

## URGENT

ATTENTION: **MINISTER OF AGRICULTURE**

Mr. John Henry Steenhuisen MP

c/o Mr. Roman Cabanac

Email(1): [MinisterDoA@nda.agric.za](mailto:MinisterDoA@nda.agric.za)

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Dear Minister,

**RE: REQUEST FOR THE RECORD OF DECISION AND CLARIFICATION REGARDING THE  
MASS VACCINATION OF CATTLE AGAINST FOOT AND MOUTH DISEASE**

1. We address you in our capacity as a civil society organisation acting in the public interest and committed to promoting accountability, transparency, and the protection of both public health and food security.
2. We refer to your announcements between 5 June 2025 and 24 July 2025 regarding the procurement of approximately 900000 doses of Foot and Mouth Disease (“FMD”) vaccines

at an estimated cost exceeding R70 million, their importation from Botswana, and the subsequent commencement of mass vaccination across affected provinces.

3. We further note the Indaba convened on 21 July 2025, where commitments were made to restructure Onderstepoort Biological Products (OBP), capacitate the Agricultural Research Council (ARC), and explore private-sector co-funding models for future vaccine banks.

4. As a matter of grave concern, it appears that the Department has already commenced operational roll-out — including animal quarantines, restrictions on movement, and the vaccination of hundreds of thousands of cattle — **without any discernible demonstration of:**

4.1. The express involvement and oversight of the Ministry of Health, particularly in relation to meat safety, food inspection, and the assessment of residual vaccine components or metabolites potentially entering the human food chain;

4.2. The prior publication of rigorous scientific evaluations or independent peer-reviewed studies validating both the safety and efficacy of the mass vaccination programme in the South African context;

4.3. Transparent disclosure of the procurement process, including the failure of OBP's national vaccine bank and the justification for reliance on imports;

4.4. A clearly articulated interdepartmental strategy addressing both veterinary disease control objectives and human health, consumer protection, and trade ramifications;

4.5. A public participatory process enabling consumers, industry stakeholders, and independent experts to provide inputs on the broader implications of this unprecedented measure.

5. Of further concern, the available information suggests that this decision was reached and implemented as an administrative action with significant implications for public health, food security, and international trade, without the requisite transparency and interdepartmental coordination — in particular with the Directorate of Food Control in the Department of Health, other food safety regulators, and statutory bodies whose legislative mandates encompass the protection of human health.
6. It is common cause that both the **Animal Diseases Act, 1984 (Act No. 35 of 1984)** and the **Meat Safety Act, 2000 (Act No. 40 of 2000)** confer clear obligations upon your Department to ensure that any prophylactic or disease-control measures in respect of food-producing animals do not create secondary risks to consumers of derived products. We must respectfully question whether these statutory safeguards were sufficiently applied and documented prior to authorising the FMD mass vaccination campaign.
7. In this regard, it is also pertinent to record that Liberty Fighters Network and myself are already the Applicants in pending **review proceedings before the High Court, Gauteng Division, Pretoria (Case No. 2025-132845)**, challenging the lawfulness of your decision to authorise the mass vaccination of poultry against Avian Influenza. That litigation raises issues strikingly parallel to the FMD rollout: namely, the absence of transparent interdepartmental oversight, inadequate scientific and food-safety disclosure, and the failure to comply with the mandatory safeguards contemplated in PAJA, common law, and the Animal Diseases Act.
8. In the circumstances, and in terms of **Section 5 of PAJA** and/or common law, we hereby formally request that you provide us with the full record of decision relating to the FMD vaccination campaign, including but not limited to:
  - 8.1. All scientific studies, risk assessments, and expert veterinary opinions considered;

- 8.2. Minutes of meetings and consultations held with ARC, OBP, statutory advisory bodies, and external stakeholders;
  - 8.3. Internal memoranda or submissions upon which reliance was placed in the decision-making process;
  - 8.4. Documented correspondence with the Ministry of Health, Directorate of Food Control, or any food safety regulators regarding the consumption of products derived from vaccinated cattle;
  - 8.5. Any records of engagement with international trade authorities or the World Organisation for Animal Health concerning South Africa's FMD status;
  - 8.6. All documentation concerning the contemplated private-sector "co-funding" model for vaccines and its legal framework.
9. Given the considerable public interest, the risk of irreversible consequences to food safety and consumer confidence, and the pattern of administrative conduct already challenged in the Avian Influenza litigation, we urgently request:
- 9.1. That further implementation of the FMD vaccination campaign be held in abeyance pending release and scrutiny of the full record of decision and supporting evidence;
  - 9.2. That you provide the requested record within fourteen (14) calendar days of the date hereof;
  - 9.3. That you confirm whether the Ministry of Health, the Directorate of Food Control, ARC, OBP, National Treasury, or any other competent authority was formally consulted prior to your authorisation of this programme.

10. Our rights to amend our pending review application, to launch fresh proceedings in respect of the FMD vaccination, and to refer this matter to Parliament, the Office of the Public Protector, or any other oversight body remain fully reserved.
11. Kindly acknowledge receipt hereof and confirm your undertaking to comply within the stipulated time period.
12. We look forward to your considered response.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'Reyno D. De Beer', written over a faint, illegible stamp or background.

**Reyno D. De Beer**

President: Liberty Fighters Network

On behalf of our members

In the interests of the Public