

Good practices in facilitating the cross-border movement of inputs and components used for the manufacturing, distribution and administering of COVID-19 vaccines

South African Revenue Service 29 September 2021

Question 1: Does your administration monitor the imports and/or exports of inputs and components used for the manufacturing, distribution and administering of COVID-19 vaccines? If yes, do you capture and disseminate detailed trade data on these products?

Answer:

Yes – All goods imported and exported into South Africa must be cleared through Customs. Customs clearance declarations (CCDs) are submitted electronically and subject to the SARS's automated risk engine. Risks are objectively identified against predetermined risk criteria. Authorised COVID-19 vaccines and related goods (incl. inputs and components) imported for the relief of distress of persons are prioritised without unnecessary delays, whilst minimising the risk of distribution of unsafe and counterfeited products.

Goods selected for physical inspection will be stopped, detained and examined in order to determine compliance with the Act or any other law in respect of such goods.

Trade statistics are compiled and published by the Commissioner in terms of Section 117(1) of the Customs and Excise Act, 91 of 1964. Trade data is extracted from Customs import and export data, and reported on Section and Chapter level. Trade statistics and reports can be accessed on [Trade Statistics – South African Revenue Service \(sars.gov.za\)](https://sars.gov.za).

Question 2: What measures has your administration implemented to facilitate the export/ import/ transit of inputs and components used for the manufacturing, distribution and administering of COVID-19 vaccines?

Answer:

SARS forms part of the National Joint Operational and Intelligence Structure (NatJOINTS) which is amongst other, coordinating government's daily response to COVID-19.

A 'Whole of Government' approach allows stakeholders and SARS, to continuously monitor and review current processes, to collaborate, and to devise innovative responses to new challenges that impacts on the safe, secure, and efficient export/ import/ transit of COVID-19 vaccines and related goods.

Having regard for international standards relevant to the international supply chain, i.e.

- World Trade Organization Trade Facilitation Agreement (WTO TFA)
- Revised Kyoto Convention (RKC)
- WCO SAFE Framework of Standards
- WCO Resolution on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines
- WCO Trade Recovery Guidelines, etc.

SARS and Regulating Authorities accordingly developed Standard Operating Procedures (SOPs) and guidelines that comprises of operational measures, to ensure that supply chains are informed and equipped to facilitate the flow of COVID-19 vaccines and related goods.

Accordingly:

1. Pre-arrival processing and fast-track procedures of essential/emergency COVID-19 vaccines and related goods, are allowed.
2. COVID-19 vaccines and related goods are prioritised for facilitation across borders to ensure that the supply chain is uninterrupted.
3. Unless otherwise specified, only **authorised** COVID-19 vaccines and related goods are permitted to be imported and exported.
4. To ensure uninterrupted supply to SACU member states, export permits for medication during COVID-19 are no longer required.
5. Export Control Regulations were removed for over 40 categories of medication. In addition, export permits for individual prescriptions, or for clinical trials are not required.

6. Risk measures are in place to combat illicit, counterfeit and illegal movement of COVID-19 vaccines and related goods.
7. Economic Operator engagement and education, to ensure that they have a clear understanding of the COVID-19 vaccines and related goods clearance procedures.
8. Border officials have a clear understanding of the logistical arrangements, such as approval and licensing procedures and relevant documents required, as well as any issues associated with movements of COVID-19 vaccines and related goods (such as conditions for storage, handling requirements, temperature control, vaccines lifespan etc.).
9. Continuous collaboration between SARS, Department of Health and other stakeholders ensures timely regulatory approvals, adequate security measures, appropriate handling and Customs clearance.
10. Authorised port of entry for COVID-19 vaccines to ensure adequate control measures, appropriate handling and Customs clearance.
11. Authorised ports of entry for any medicines and/or specified scheduled substances imported into South Africa to ensure adequate control measures, appropriate handling and Customs clearance.
12. Preferred service providers have been appointed and authorised to facilitate the import of COVID-19 vaccines.

Question 3: In the process of designing those measures, have there been consultations/cooperation with the pharmaceutical companies that import or export those inputs and components in your country? Please provide details.

Answer:

Yes – The role of government, state-owned companies and private sector varies, while sharing a common objective. Consequently, consultations/collaboration between interested parties is done using a combination of communication channels that have been initiated through national, provincial and local communication systems. This communication campaign is guided by the progressive vaccine communication strategy.

At the heart of the strategy are partnerships that draw in different stakeholders to advance the vaccination rollout drive.

This assists in creating capability, to reduce vulnerabilities to the supply chain and enable rapid COVID-19 vaccines and related goods rollout.

Question 4: Has your Administration used the guidance material provided by the WCO and has it been useful? Please provide details of which guidance documents have been used and found useful, for example the HS classification reference for vaccines and related supplies and equipment, the Joint Indicative List of Critical COVID-19 Vaccine Inputs, the Secretariat Note on the Role of Customs in facilitating and securing the cross-border movement of situationally critical medicines and vaccines, etc.

Answer:

Yes – The following guidance material as provided by the WCO has been used.

- List of priority medicines for Customs during COVID-19 pandemic
- INN LIST 124 COVID-19 (Special Edition)
- HS classification reference for COVID-19 medical supplies 3.01 edition
- HS classification reference for vaccines and related supplies and equipment
- Joint Indicative List of Critical COVID-19 Vaccine Inputs for Consultation (Version 1.0)
- Role of Customs in facilitating and securing the cross-border movement of situationally critical medicines and vaccines 2nd edition

The guidance material have been circulated to Customs operational staff responsible for risk identification, documentary review and cargo inspections. These guides have served as reference material to identify and confirm in advance the correct classification of many COVID-19 vaccines and related goods.

Question 5: Please share any details not covered by the questions above, which you consider

Answer:

The below role players function as a workgroup to ensure alignment and co-ordination in the importation of COVID-19 vaccines and related goods.

COVID-19 role players are:

- Government and state-owned companies:
- National Department of Health (NDOH)
- South African Revenue Service (SARS)
- South African Police Service (SAPS)
- South African Health Products Regulatory Authority (SAHPRA)
- Airports Company South Africa (ACSA)
- South African Civil Aviation Authority (SACAA)

Private sector

- Airlines
- Freight Forwarders
- Cargo Handlers
- Clearing Agents
- Road Hauliers (Movement from Airport to Storage Facility)
- Security Firms (Armed Escort Service)
- Warehouse Owners (Transit Sheds / Warehouses)