FREQUENTLY ASKED QUESTIONS

Pre-export Verification of Conformity Programme (PVOC)

> This document answers the most frequently asked questions about South Africa's new PVoC Programme. For further information visit www.sabs.co.za or attend a SABS public awareness session during the transition period.

CATEGORY 1 – UNDERSTAND THE PROGRAMME

Q1. What is the PVoC Programme?

PVoC stands for **Pre-export verification of Conformity**. It is a programme that ensures certain products are checked for safety and quality before they are shipped to South Africa — not only when they arrive at the border.

> Example: *Toys destined for South Africa are inspected in the country of origin before shipping to confirm they meet safety requirements.*

Q2. What is the scope of the PVoC Programme?

The PVoC Programme applies only to unregulated products during Phase 1 implementation.
In terms of the Ministerial Directive:

- The Programme is legally limited to products not currently subject to compulsory specifications or regulatory oversight.
- It is designed to strengthen pre-import quality assurance and consumer protection for these product categories.
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Q3. Why is South Africa introducing this programme?

Each year, unsafe or poor-quality products enter the country and reach consumers. These include:

- Toys containing harmful chemicals.
- Furniture that fails prematurely

The PVoC Programme intercepts non-compliant products before they reach South African consumers, reducing risk and protecting lives.

Q4. Is the programme starting immediately?

There will be a six-month transitional period during which:

- Businesses and importers are afforded an opportunity to prepare their supply chains.
- The South African Bureau of Standards (SABS) may conduct risk-based, random inspections, verifications, and compliance checks against applicable standards for the purposes of system testing, process validation, and operational readiness.
- SABS will undertake stakeholder engagement and industry awareness initiatives to support exporter and importer .

Q5. Which products will be subject to verification?

The programme focuses on high-risk consumer products. The product list will be reviewed and expanded as the programme matures.

Q6. Which country is included in the first pilot phase?

The pilot phase begins with products imported from China, South Africa's largest import partner. The programme will expand progressively to other countries.

Q7: Why is this programme targeting China?

The programme is not targeting any country.

The pilot phase starts with China because it is South Africa's largest import partner and represents a significant portion of high-risk consumer goods.
The intention is to expand the programme to other countries in a non-discriminatory manner, in line with international trade rules.

Q8: How do I know which products fall under the PVoC programme (Annexure 1), and are these products linked to HS Codes?

Yes.

The products listed in Annexure 1 of the PVoC programme are mapped to specific Harmonised System (HS) Codes, which are used by customs to identify goods during importation.

How it works:

- Each product category in Annexure 1 is linked to a specific HS Code or range of HS Codes
- When goods are declared to customs, they are classified using these HS Codes
- The customs system (SARS) uses these codes to automatically identify products that fall within the PVoC scope.
- SABS, in collaboration with SARS Customs, is in the process of finalising the integration of PVoC Phase 1 products into the SARS customs risk management and product classification framework.
- This includes the incorporation of relevant PVoC product categories into the SARS restricted product (PR) list, enabling automated identification of applicable consignments through HS Code-based risk triggers at ports of entry.

Q9: What if certain products currently listed under PVoC are already regulated by other authorities?

The PVoC Programme includes a structured review and validation process during the transition period to ensure full alignment with South Africa's regulatory framework.

Where products that are already subject to existing regulatory are identified within the current **Annexure 1 listing:**

- Such inclusion is preliminary and subject to formal verification.
- These products will be reviewed in consultation with the relevant competent authorities.
- In line with the Ministerial Directive, regulated products are not within the legal scope of PVoC and will therefore be removed prior to full implementation.

Furthermore:

- The Directive provides for automatic exclusion of any product that falls under a compulsory specification or regulatory regime.
- The Annexure 1 product list will be updated periodically to maintain alignment with all applicable legislation.

This process ensures that the PVoC Programme:

- Does not create regulatory duplication or conflict, and
- Remains fully aligned with South Africa's consumer protection and legislative framework.

Q10: What happens if a regulated product appears on the PVoC product list (Annexure 1)?

If a product already subject to regulatory oversight is included in Annexure 1:

- This does not override existing legislation or regulatory mandates.
- Such products will be removed through the review process before enforcement.
- The Directive provides for automatic exclusion of regulated products.

Q11: What if a product becomes regulated after being included in PVoC?

Where a product listed under PVoC subsequently becomes subject to a compulsory specification or regulatory regime:

- It will automatically fall outside the scope of the PVoC Programme
- This exclusion takes effect from the date the regulation becomes applicable.

Q12: Why is there a six-month transition period?

The six-month transition period is a **critical regulatory alignment phase** intended to:

- Engage regulators, industry, and stakeholders.
- Identify and resolve overlaps or gaps.
- Ensure legal and operational readiness.

This ensures that the Programme is **fully compliant before enforcement begins (September 2026).**

Q13. How are standards applied under the PVoC Programme?

The PVoC Programme allows the use of recognised reference standards, however:

- Where a South African National Standard (SANS) exists and is more stringent:
- ✓ SANS requirements take precedence within South Africa.
- PVoC certification does not replace local regulatory requirements.

Q14. What happens if a reference standard is weaker than SANS?

If a reference standard used for PVoC purposes is later found to be inferior:

- Products may be subject to:
- ✓ Market surveillance
- ✓ Re-testing or reassessment
- ✓ Regulatory enforcement actions

This ensures continued protection of consumers and market integrity.

Q15: Will SABS or the dtic provide guidance on acceptable standards?

Yes.

Guidance will be provided through:

- Implementation guidelines
- Stakeholder engagements during the transition period

- Technical clarification notes where necessary

This will address:

- Equivalence thresholds
- Acceptance of reference standards
- Alignment with SANS requirements

Q16. How will regulatory conflicts or overlaps be avoided?

The Programme has built-in safeguards to prevent overlap:

- Scope limited to unregulated products only.
- Automatic exclusion of regulated products
- Ongoing review of Annexure 1
- Structured stakeholder engagement

Q17. When will the PVoC Programme be fully implemented?

- Full Enforcement: Expected September 2026

Q18. What is the role of stakeholders during the transition period?

Stakeholders are expected to:

- Participate in consultations.
- Raise concerns or identify gaps.
- Validate product classifications and standards.
- Prepare for compliance requirements.

Q19. What is the overall objective of the PVoC Programme?

The Programme aims to:

- Enhance consumer protection.
- Prevent entry of substandard or unsafe products.
- Strengthen pre-border quality assurance mechanisms.
- Support fair trade and regulatory compliance.

Q20: What this means for importers:

If your product falls under one of the listed HS Codes:

- it will be flagged by the customs risk management system.
- you will be required to provide a Certificate of Conformity (CoC)
- the shipment may be subject to verification if the CoC is missing or invalid.

CATEGORY 2 – CERTIFICATES, INSPECTIONS & PROCESS

Q1. What is a Certificate of Conformity (CoC)?

A CoC is an official document that confirms a product has been inspected and meets South African national standards (SANS). It functions as a “safety pass” for goods entering South Africa.

Q2. Who inspects the products before shipment?

Products are inspected by approved inspection bodies such as CCIC, operating under the oversight and authority of SABS. All inspections must conform to applicable SANS standards.

Q3. What happens if goods arrive without a CoC?

If a shipment of regulated products arrives without a valid Certificate of Conformity, customs authorities may:

- Hold the shipment pending further review.
- Conduct a physical inspection of the goods.
- Request additional supporting documentation.
- Delay clearance until conformity is verified.

Importers are strongly advised to ensure all required documentation is in order before shipment.

Q4. How will customs identify which products need a CoC?

The system uses a combination of:

- Product classification codes (HS codes)
- Integrated digital systems.
- Customs risk management controls.

This enables automatic identification of high-risk goods at the point of import.

Q4. Does PVoC replace existing import regulations?

No. PVoC is an additional safety layer applied before export. It complements — and does not replace — South Africa's existing import regulations and border controls.

CATEGORY 3 – IMPACT ON TRADE & IMPORTERS

Q1. Will PVoC stop or restrict imports into South Africa?

No. The programme does not restrict trade. Its purpose is to ensure that imported products are safe and compliant — not to limit the volume or range of imports.

Q2. Will PVoC make products more expensive for consumers?

The cost impact of pre-export verification is expected to be minimal. Moreover, the programme helps prevent far more costly outcomes, including:

- Injuries and property damage from unsafe products
- Costly product recalls and liability claims
- Consumer loss of confidence in imported goods

> Example: *The cost of verifying a charger before shipment is far less than the financial and human cost of a house fire caused by a faulty device.*

Q3. Will goods take longer to arrive as a result of PVoC?

In many cases, transit times may actually improve. Compliant goods with a valid CoC face fewer delays at the border and require less customs intervention, resulting in faster clearance.

Q4. What should importers do to prepare?

Importers should take the following steps during the transition period:

- Notify overseas suppliers of South African standards requirements.
- Verify that products meet applicable SANS standards.
- Arrange pre-export inspections through approved CCIC.
- Prepare and retain all required documentation.
- Attend SABS workshops and information sessions.

Q5. Will small importers be negatively affected?

No. The programme is being introduced gradually. The six-month transition period, combined with SABS training support and guidance materials, is specifically designed to help smaller businesses adapt without disruption.

Q6: Is this not a violation of WTO rules?

No. The programme is designed to comply fully with World Trade Organization principles.

It is based on legitimate objectives such as consumer safety and product quality, and it will be applied in a transparent and non-discriminatory manner as it expands.

Many countries around the world use similar systems."

CATEGORY 4 – BROADER ECONOMIC & TRADE BENFITS

Q1. How does PVoC benefit South Africa?

The programme delivers a range of national benefits:

- Protects consumers from unsafe and substandard products.
- Improves the overall quality of goods in the market.
- Reduces the prevalence of counterfeit and fake products.
- Supports fair competition between importers and local manufacturers.

Q2. Will PVoC worsen de-industrialisation?

No — PVoC helps prevent de-industrialisation. Without controls, unsafe imports can undercut local businesses that are required to meet strict safety standards. PVoC levels the playing field by ensuring all products — imported or locally produced — meet the same requirements.

> **Example:** *Local manufacturers already comply with SANS standards. PVoC ensures imported products are held to the same standard, making competition fair.*

Q3. How does PVoC help fight counterfeit goods?

Counterfeit products often circumvent safety testing, use fraudulent certificates, and imitate reputable brands. By verifying products before export, PVoC:

- Makes it significantly harder for fake goods to enter South Africa.
- Establishes an auditable chain of conformity from origin to destination.
- Deters exporters of non-compliant products from targeting the South African market.

Q4. Does PVoC support fair trade?

Yes. PVoC ensures equal safety standards are applied to all products regardless of origin. This promotes fair competition, protects honest businesses, and improves quality across the market — without restricting trade.

Q5. What is the long-term benefit of the PVoC Programme for South Africa?

Over time, the PVoC Programme will:

- Improve product safety and reduce consumer harm.
- Strengthen and protect local industries.
- Reduce the flow of unsafe and illegal goods into the country.
- Build lasting consumer trust in products available in South Africa.
- Support a stronger, more competitive, and safer economy.

"PVoC protects people, supports fair business, and improves the quality of products in South Africa — without restricting trade."

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