



Milk SA - Dairy Regulations & Standards 2024

(PRJ-0365-2024)

Dairy Standard Agency

Year 2024 (January 2024 till December 2024)

Project goals

Goal 1 - Deliberation of industry regulations relating to food safety, product composition, metrological and related standards as well as voluntary industry related standards e.g., animal welfare and related matters.

Achievements

The organised dairy industry acknowledges the importance of compliance with the law and related standards (national and international) as they pertain to the dairy value chain. The regulatory landscape relating to milk and other dairy products is of a multi-dimensional nature and involves regulations relating to:

product composition;
food safety;
animal health and welfare;
animal feed;
milking parlours;
the transportation of milk;
processing plants;
storage; and
related matters such as environmental management and export requirements.
Export requirements

Publication of voluntary standards known as South African National Standards compiled by the South African Bureau of Standards (SABS) are subject to public participation and are also considered as an integral part of the function of this project. Participation in the African Organisation for Standardisation (ARSO) technical committee, which is subject to standards harmonisation work is the ARSO/TC 04, Milk and milk products were also dealt with under this project via the South African Bureau of Standards (SABS) TC 034/SC05, Milk and Milk Products. Industry inputs regarding international standards of the International Standards Organisation and the Codex Alimentarius are equally important when considering review and amendment of national legislation pertaining to the legal landscape applicable to the South African dairy industry.

Effective communication of regulations and standards and aspects relating to the enforcement thereof is essential, as the dairy industry is required to be fully conversant with current and proposed changes to legislation and voluntary standards. To assist in this regard, the activities of the project were executed according to the 2024 project plan, which is subject to review on an annual basis.

The Regulation and Standards Project of Milk SA actively participated in formalizing draft regulations and standards and comments on regulatory matters, legal consultation as well as communication through

Milk SA in the interest of the dairy industry and other stakeholders.

The project management of the Regulations and Standards Project (R&D) of Milk SA regularly consulted during the reporting year with the organised dairy industry and other stakeholders with specific reference to the following:

Interaction regularly with the project managers of Milk SA's Consumer Education Project (CEP), South African Milk Processors' Organization (SAMPRO), Milk Producers Organisation (MPO) as well as the Project Coordinating Committee of Milk SA (DSA, CEP and Dairy Research and Development Committee (DRDC).

The Dairy Research and Development Committee (DRDC) of Milk SA and management committee meetings were attended, and subsequent contributions were made towards regulatory matters regarding sustainability with specific reference to environmental management and animal welfare.

Joint interaction on International Dairy Federation (IDF) matters, as well as with the Consumer Goods Council of South Africa (CGCSA) continued to ensure comprehensive reports, based on science to the respective regulatory bodies.

No Non-achievements / underperformance has been reported

Goal 2 - Liaison with industry and statutory bodies in terms of draft, promulgated and repealed legislation and effective communication through the Milk SA organisational structures.

Achievements

DEPARTMENT OF HEALTH – FOODSTUFFS, COSMETICS AND DISINFECTANTS ACT

1.1 Front-of-pack nutrition labelling and the draft regulations relating to the labelling and advertising of foodstuffs

Front-of-pack nutritional labelling (FOPNL) refers to a nutrition labelling system that is presented on the front of food packages to support consumers to make healthier food choices at the point of purchase by delivering simplified and at-a-glance nutritional information.

The review of R3337, regulations relating to the labelling and advertising of foodstuffs on 21 July 2023, has commenced by the Department of Health (DoH) after the collation process. The review process continued during 2024. Consultations with stakeholders (where necessary) were scheduled and the submission of the draft to the Minister of Health will take place during the first quarter of 2025. It was noted that the directorate had maximised resources to collate the vast number of comments received to expedite the process.

1.2 Matters relating to R1555 of November 1997, Regulations relating to milk and dairy products under the Foodstuffs, Cosmetics and Disinfectants Act

The work of this project has been ongoing in respect of research (Milk SA Project) by the Dairy Standard Agency (DSA) staff member on risk assessment to determine the significance of E. coli and coliforms as indicator organisms of hygiene and food safety in milk in South Africa to update specifications as set out in Regulation 1555. Review of the current standards for milk somatic cell counts as well as analytical methods are also assessed and aligned with scientific evidence. Work on the proposed draft will continue in 2025 as it is further (where applicable) aligned with relevant international standards to support international trade as well avoiding technical trade barriers.

1.3 Clarity on the use of the Lactose Peroxidase System (LPS) under controlled conditions

Formal correspondence was forwarded to the Department of Health: Directorate Food Control regarding the use of the Lactose Peroxidase System (LPS) under controlled conditions (as per the

WHO guidelines) to assist the dairy industry in maintaining the quality of unprocessed milk. Following correspondence received from the Department of Health (DoH) regarding the use of the Lactose Peroxidase System (LPS) under controlled conditions, a study has been initiated for the use of the LPS by the organised dairy industry under abnormal conditions to maintain the quality of unprocessed milk during storage and transportation. The LPS is internationally well recognised and used and the DoH responded in favour of the use of LPS with restrictions to ensure alignment with the Codex guidelines for the use of LPS only in raw or unpasteurised milk not destined for export. By the end of the second quarter in 2024, the study was extended to determine the effectiveness of the LPS on deactivating the presence of the Foot-and-Mouth Disease Virus in unpasteurised milk from infected herds. The study was completed at the end of 2024 with no successful scientific outcomes due to external variables over which the DSA had no control.

DEPARTMENT OF AGRICULTURE, LAND REFORM AND RURAL DEVELOPMENT - AGRICULTURAL PRODUCTS STANDARD ACT: DIRECTORATE FOOD SAFETY AND QUALITY ASSURANCE

2.1 Review of dairy and imitation dairy product regulations

For background purposes, the Regulation and Standards Project of Milk SA continued to liaise with the industry through the Milk SA established Technical Workgroup (TWG). The Milk SA TWG convened during since 2022 followed by various draft proposals.

The draft proposals were further deliberated during 2023, also taking into consideration the activities of various standing committees of the International Dairy Federation (IDF) and the African Organisation for Standardisation (ARSO) and the possible impact thereof on the proposed draft of which a third version was circulated by the Milk SA Technical Work Group to the organised dairy industry for consideration and comments.

A request was forwarded to the Directorate: Food Safety and Quality Assurance (FSQA) to discuss any possible areas of conflict that may arise from the draft proposal. The draft proposal was submitted at the end of 2023 and continue during 2024.

Two industry meetings were held with one facilitated by the Department of Agriculture, Land Reform and Rural Development (DALRRD) to integrate final comments and submission to FSQA. The target date for submission was scheduled for 5 April 2024. Feedback from the DALRRD indicated that the industry comments collated are still under review until further notice. The categorisation of dairy in the draft between “real dairy”, imitation or modified dairy and dairy alternatives brought along several technical challenges, especially with attempts to align the said proposed draft with the Codex general standards for the use of dairy terms. Work will continue during 2025.

2.2 rBST claims

A formal letter was addressed to the management of the FSQA explaining the position of Milk SA regarding the use of “rBST free” (recombinant bovine somatotropin) claims on dairy product containers. Permission was granted to FSQA to share the information with the interested party (retailer) for further discussion on the legalities regarding the use of such a claim. To speed up the process, the project manager also engaged with the retailer and testing laboratory in question.

The response from FSQA was received, which contained a legal opinion of the retailer and that the matter will be further pursued under the new Agricultural Product Standards Amendment Act once the draft regulations relating to the management control system in respect of the sale and export of a certain agricultural product became effective.

2.3 Agricultural Product Standards Amendment Act

The Act was assented by the President in April 2024, when it was published for general information. Whilst the Act cannot be enforced yet. However, during 2024 the project manager participated in industry

sessions with the Consumer Council of South Africa in respect of the Draft regulations relating to the management control system in respect of the sale and export of certain agricultural product published in May 2024. This work will continue into 2025 as it is also intended to regulate management systems of products such rBST claims, free range and organic in the dairy industry.

2.4 Agricultural Product Standards Act (APS): Export Regulations

A notice was published in the government gazette regarding the amendment of the “Standards and requirements regarding control of the export of dairy products” and circulated early in January 2024. These standards, as in the past, will be enforced by the Perishable Export Control Board (PPECB) as appointed assignee under the APS Act.

2.5 Directorate Veterinary Public Health

The maintenance of relationships and liaison with the directorates were continuous during 2024 as several matters relating to review of regulations, import and export requirements, veterinary procedural notices as well as the establishment of a national chemical residue monitoring programme received high priority. It is foreseen that this profile of liaison will continue in the collective interest of the dairy industry until the chemical residue monitoring programme is fully implemented and maintained.

The establishment of a chemical residue monitoring programme for export to the European Union and China is still under review in conjunction with DALRRD. The dairy and red meat industries were prompted to collaborate in compiling a sampling control plan, as both are dealing with bovine species. Information was obtained from the organised dairy industry in terms of all dairy facilities to assist with the work and to compile a risk analysis on the combined list of active substances (beef and dairy cattle). The project manager in conjunction with the State Veterinarian Import/Export Policy Unit Directorate: Animal Health and other officials are still working on the completion of the finalisation of comments on the proposed protocols. The last formal meeting with officials took place in December 2024 and the work will continue in 2025. The VPN 20 related to the standards for the registration of a veterinary-approved dairy facility for export was completed and circulated to industry members.

In respect of the outbreak the foot-and-mouth disease (FMD) in the Eastern Cape, the project manager collaborated with Drs Mark Chimes and Anthony Davis as well as other role players by attending the FMD Technical and Trade meetings to assist in finding solutions for management control in the FMD area.

3. MATTERS RELATING THE BORDER MANAGEMENT AUTHORITY ACT, 2020

The Border Management Authority (BMA) was launched on 5 October 2023.

During interaction with health officials of the BMA, it was noted that the services are mainly rendered by the following regulatory authorities:

BMA Health Specialists

BMA Plant Inspectorate

BMA State Veterinary Inspectorate

National Regulator for Compulsory specifications

South African Health Products Regulatory Authority

Current challenges experienced by Port Health are:

Insufficient inspection percentages/frequencies due to a shortage of staff at ports of entry

False declarations

Incorrect tariff codes

Extended health detentions in some of the provinces

The implementation of this act was monitored during 2024, with no substantial dairy-related matters to report on that required actions from the Milk SA Regulation and Standards Project.

CONSUMER GOODS COUNCIL OF SOUTH AFRICA (CGCSA)

The Dairy Standard Agency as a member of the Consumer Goods Council of South Africa (CGCSA) attended several meetings during 2024 to assist in formulating industry views on amongst:

Food loss and waste

Sustainability

Terms of reference for DALRRD assignees

Draft Management control system regulations.

No Non-achievements / underperformance has been reported

Goal 3 - Liaison with international bodies e.g., African Organisation for Standardisation, Codex Alimentarius and International Dairy Federation.

Achievements

5. SOUTH AFRICAN BUREAU OF STANDARDS, AFRICAN ORGANISATION FOR STANDARDISATION AND INTERNATIONAL STANDARDS ORGANISATION

5.1 South African Bureau of Standards (SABS)

Dr Mark Chimes as the project manager of the Milk SA Sustainability Project: Animal Health and Welfare has joined the working group on “The welfare of dairy cattle and transportation of livestock”. The work on SANS 1694 and 1488 relating to the welfare of dairy cattle and the transport of livestock continued to liaise with the Livestock Welfare Coordinating Committee as well as with the SABS Standards Writer: Natural Sciences. SABS experienced major cyber security breaches during 2024, which contributed to brake in communication.

In respect of SABS/TC 0034/SC 05 (Milk and Milk products) documents made available for balloting were voted upon. No formal meetings took place during the fourth quarter of 2024.

5.2 African Organisation for Standardisation (ARSO)

Mrs Anneke van Niekerk, on behalf of Milk SA, has been contracted on behalf of the project manager to participate in the ARSO activities.

Monthly meetings and plenary sessions for purposes of generating national comments and positions were attended during 2024. The work of ARSO is progressing and the below list of drafts are due for Draft African Standard and Committee Draft Standards (CD) under ARSO TC 04, Milk and Milk Products. The Draft African Standard (DARS) under Enquiry stage, the heads of delegation in liaison with the various offices, were called to make arrangements to notify the World Trade Organization through the member states notification desks. By end 2024, 60 standards were under discussion by the technical committee.

The leadership team, of which the DSA is a part, will continue with the editing work moving the standards from CDs to DARS to FDARS and finally proposing publishing. This is estimated to be for the remainder of 2025 with monthly feedback sessions discussing technical comments.

5.3 *International Standards Organisation (ISO)*

To allow for full participation, ISO permission for the full participation in the balloting processes with specific reference to ISO/TC 034/SC 5 - Milk and milk products and ISO/TC 034/SC 17 – Management system for food safety was granted by ISO. The following work items received attention during 2024, and voting commenced on the following:

ISO/DIS 22002-4: Prerequisite programmes on food safety — Part 4: Food packaging manufacturing

ISO/DIS 22002-100: Prerequisite programmes on food safety — Part 100: PRP requirements common for food, feed, and packaging supply chain

ISO/DIS 22002-7: Prerequisite programmes on food safety — Part 7: Retail

ISO/DIS 22002-5: Prerequisite programmes on food safety — Part 5: Transport and storage

ISO/DIS 22002-1: Prerequisite programmes on food safety — Part 1: Food manufacturing

ISO/DIS 22002-2: Prerequisite programmes on food safety — Part 2: Catering

ISO/DIS 22002-6 (Ed 2)

ISO/DIS 22002-6: Prerequisite programmes on food safety — Part 6: Feed and animal food production

The following ballots were prepared for voting in November 2024:

N103 Systematic review SANS 10049: Food safety management – Requirements for prerequisite programmes (PRPs)

N103 Systematic review SANS 14159: Safety of machinery – Hygiene requirements for the design of machinery

N103 Systematic review SATS 22002-1: Prerequisite programmes on food safety – Part 1: Food manufacturing

N103 Systematic review SATS 22002-3: Prerequisite programmes on food safety – Part 3: Farming

N103 Systematic review SATS 22002-6: Prerequisite programmes on food safety – Part 6: Feed and animal food production

The following standards were under review during the last quarter of 2024:

ISO/FDIS 29981 Milk products — Enumeration of bifidobacteria — Colony-count technique 2024-10-28.

ISO 16756:2024 Milk and milk products — Guidance for the application of Carr-Purcell-Meiboom-Gill (CPMG) pulsed time-domain nuclear magnetic resonance (TD-NMR) spectroscopy for fat determination.

6. INTERNATIONAL DAIRY FEDERATION (IDF) AND CODEX ALIMENTARIUS

The project manager serves on various standing committees of the IDF as well as task teams dealing with comments in preparation of Codex sessions relating to imports and exports, food labelling, e-commerce and food additives, during 2024.

The work by action teams continued during 2024 at the IDF World Dairy Summit in France during the business meetings. Meetings were well attended by South African delegates and the following matters relating to Codex Alimentarius received the necessary attention:

Draft guidance on the provision of food information for prepackaged foods to be offered via e-commerce.

Codex Committee on Food Labelling - Allergen Labelling.

Comments to Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) regarding food fraud.

Discussion paper on harmonised probiotic guidelines for use in foods, beverages and food supplements.

Food additives and food hygiene.

Codex general standards for the use of dairy terms with specific reference to lab-produced foods.

Where applicable, reports were submitted on behalf of the South African National Committee of the IDF to the IDF as well as the South African Codex Contact point.

As per the Milk SA contractual agreement all relevant correspondence and comments, where applicable, were shared with Milk SA and industry stakeholders as well as reporting to the South African National Committee of the IDF.

No Non-achievements / underperformance has been reported

Goal 4 - Liaison and consultation on an internal and external basis and comment within specified time frames via Milk SA organisational structures.

Achievements

Liaison continued during the year with all relevant stakeholders as well as interaction with roleplayers with whom communication via the Milk SA organisational structures served as a priority. Liaison and consultation were mainly influenced by protocols relating to foot and mouth disease, veterinary procedural notices, chemical residue monitoring, export control, food safety and dairy product compositional matters.

No Non-achievements / underperformance has been reported

Goal 5 - Report to industry via Milk SA structures.

Achievements

Regular reporting via Milk SA structures continued to ensure appropriate action by industry members. Reporting was done via Milk SA quarterly reports, sharing of relevant matters at the Milk SA Coordinating Committee allowing for other Milk SA projects interaction and engagement as well as attending industry association general meetings. Scientific matter were also addressed through the Milk SA Research and Development project.

No Non-achievements / underperformance has been reported

Goal 6 - Liaison with government, departments regarding legislation and policies within the scope of the project, that may affect the Milk SA strategic goals.

Achievements

Sound relationships with the respective parastatals are paramount to ensure contribution to the overarching, strategic goals of Milk SA and to mitigate possible risks to the project. The level of commitment by the project team ensured ongoing recognition from government structures as well as industry associations outside the Milk SA organisation. These actions allowed for value addition to the Milk SA strategic goals in a direct and indirect way as well as the respective government bodies.

No Non-achievements / underperformance has been reported

Income and expenditure statement

Income and expenditure statement	December 2024 - CORFIN151 - PRJ-0365.pdf December 2024 - CORFIN173 - PRJ-0365.pdf
Unnecessary spending during period	No

Popular Report

[RS Project Popular Annual report 2024.pdf](#)

Additional documentation

No file has been uploaded

Statement

Levy funds were applied only for the purposes stated in the contract	Yes
Levy funds were applied in an appropriate and accountable manner	Yes
Sufficient management and internal control systems were in place to adequately control the project and accurately account for the project expenditure	Yes
The information provided in the report is correct	Yes

