Regulations and Standards Project of Milk SA

(PRJ-0407-2025)

Dairy Standard Agency

Year 2025 (January 2025 till December 2025)

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

1. DEPARTMENT OF HEALTH

Directorate: Food Control – Foodstuffs, Cosmetics and Disinfectants Act

1.1 Draft regulations relating to the labelling and advertising of foodstuffs (R.3337 dated 21 July 2023)

Throughout 2025, the Department of Health continued the process of collating and incorporating the extensive comments received on the draft regulations. During the year, the Department reported significant progress, including revisions to selected provisions and initiating the process of an impact assessment. The Department further indicated that consultations were to be conducted with selected stakeholders and academic institutions involved in front-of-pack labelling research. However, the timeline for finalising the amendment process could not be confirmed.

1.2 Review of the "Regulations relating to milk and milk products" (R.1555 dated 21 November 1997)

The review of Regulation R.1555 progressed substantially during 2025. The draft proposed amendments were informed by the outcomes of Milk SA-funded research conducted by a Dairy Standard Agency (DSA) staff member. The research focused on a risk assessment evaluating the relevance of Escherichia coli and coliforms as indicator organisms for hygiene and food safety in milk in South Africa. The findings informed the proposed microbial specifications, as well as a review of somatic cell count standards and analytical methods to ensure alignment with current scientific evidence.

During the year, a draft of the proposed amendment regulations was circulated within the dairy industry, including to dairy microbiology experts, for inputs and comments. By the fourth quarter, the comments received were under review and in the process of being incorporated prior to submission of the draft proposed amendments to the Department of Health.

1.3 Clarity on the use of the Lactoperoxidase System by the South African Dairy Industry

During the third quarter, the Directorate: Food Control issued a letter to the Dairy Standard Agency permitting the use of the lactoperoxidase system in the production of secondary dairy products by the South African dairy industry. This permission is subject to the condition that the lactoperoxidase, system when used as a processing aid, complies with the principles and safety requirements set out in the applicable Codex standards and guidelines, including the Codex Guidelines on Substances Used as Processing Aids.

2. DEPARTMENT OF AGRICULTURE

2.1 Directorate: Food Safety and Quality Assurance (FSQA) - Agricultural Products Standard Act

2.1.2 Agricultural Product Standards (APS) Amendment Act.

During the third quarter, the Agricultural Product Standards Amendment Act, 2023, published on 3 April 2024, was proclaimed into operation through Proclamation No. 279 of 2025 on 6 August 2025 .This enabled the publication of the Regulations relating to the Management Control System (R.6634 dated 19 September 2025).

2.1.2 Draft Amendment of the Dairy and Imitation Dairy Regulation (R.1510 dated 22 November 2019)

During 2025, the Directorate: Food Safety and Quality Assurance (FSQA) continued its work on the draft amendment of the Dairy and Imitation Dairy Products Regulations. Industry comments on the first draft amendment were collated, with many of Milk SA's submissions incorporated into the second draft. Notice No. 6051 was published on 15 August 2025, inviting further comments on the second draft amendment.
Milk SA, through the Dairy Technical Working Group and in consultation with the broader dairy industry, coordinated industry inputs during the official commenting period, which closed on 30 September 2025. By year-end, the Directorate: FSQA indicated that the process of reviewing and responding to comments was ongoing, with certain proposed provisions still under consideration for inclusion. The timeline for finalising the amendment process could not be confirmed.

2.1.3 Regulations relating to the Management Control System (R.6634 dated 19 September 2025)

The Regulations relating to the Management Control System (MCS) were published to establish a regulatory framework governing production method claims made on the labels of agricultural products regulated under the Agricultural Product Standards Act. Such claims include, among others, "organic," "free-range," "pasture-fed," and "grass-fed."
In terms of the Regulations, any management control system claim must be registered with the Executive Officer and is subject to auditing by designated assignees to ensure credibility, traceability, and verifiability. Although the Regulations will only come into operation in September 2026, stakeholders were encouraged to submit applications by 31 March 2026 to facilitate a smooth transition to regulatory compliance.

2.2 Directorate: Animal Health

2.2.1 Chemical residue monitoring programme for export to the European Union and China

Following the submission of a comprehensive document on the National Residue Monitoring Programme (NRMP) to the State Veterinarian within the Import/Export Policy Unit of the Directorate: Animal Health for review, the final NRMP document was updated on 3 March 2025. The updated document details the formula used to determine sample numbers, outlines the pre-established sampling plan, and specifies the residue compounds or markers together with their permissible maximum residue limits required for the export of milk to China.
The updated NRMP document has been circulated to exporting members of the dairy industry and is attached for reference and information.

2.2.2 Veterinary Procedural Notice 20 (VPN 20)

Veterinary Procedural Notice (VPN) 20, originally compiled in 2010 and amended in November 2024, continued to be in force during 2025. The Notice comprises annexures setting out export requirements for various markets. Among these is Annexure E, which addresses the export of dairy and dairy-based products to China. Annexure E was circulated to industry stakeholders.

2.2.3 Foot-and-Mouth Disease (FMD) Outbreak

Throughout 2025, the Northern Cape has been the only province nationally that did not report any cases of Foot-and-Mouth Disease (FMD). Milk SA and the Dairy Standard Agency (DSA) actively participated in initiatives aimed at identifying and implementing management control solutions by establishing the Foot and Mouth Disease (FMD) Work Group to assist in finding solutions for management control in the KZN FMD area.
In response to the escalating FMD situation, the Minister of Agriculture appointed the Ministerial Advisory Task Team on Animal Disease Prevention and Control. A Milk SA representative, Dr Mark Chimes, was

included in the Ministerial task teams and advisory structures dealing with controlled animal diseases. By December 2025, the Task Team had developed a roadmap to achieve South Africa's primary objective of attaining FMD-free status with vaccination. The roadmap targets 100% vaccination coverage in dairy cows and 90% coverage in animals within communal areas, commercial farms, and feedlot operations.

3. CONSUMER GOODS COUNCIL OF SOUTH AFRICA (CGCSA)
As a member of the Consumer Goods Council of South Africa (CGCSA), the Dairy Standard Agency (DSA) participated in Food Safety Initiative (FSSI) compliance committee engagements throughout 2025. Discussions focused on the key FSSI pillars, namely Health and Wellness, Food Loss and Waste, Food Safety and Quality, Trade, and Environmental Sustainability.
During the fourth quarter, the DSA further committed to participating in the CGCSA Illicit Economy Project, which was launched to combat illicit and counterfeit trade within the fast-moving consumer goods (FMCG) sector. The initiative aims to protect consumers, strengthen enforcement efforts, and support industry integrity, with particular relevance to challenges within the dairy sector, including adulteration, mislabelling, illegal raw milk sales, and production in unapproved facilities.

4. SOUTH AFRICAN BUREAU OF STANDARDS (SABS)
During 2025, active participation continued in South African Bureau of Standards (SABS) technical committees relevant to milk and dairy products. Mrs Anneke van Niekerk, representing Milk SA, was nominated and confirmed as Chairperson of SABS TC 034/SC05 on Milk and Dairy Products.
Key developments included the publication and reaffirmation of several dairy-related standards, the withdrawal of obsolete standards, and participation in ballot voting on standards related to hygiene practices, analytical methods, and food safety prerequisite programmes. Committee activity was, however, limited during certain periods due to operational challenges faced by SABS following its major ransomware attack.

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

Updated notifications regarding the declaration of the Foot and Mouth Disease Management Area were circulated to stakeholders throughout the year.

Industry members were further informed, through the established communication system, of the proclamation into force of the Agricultural Product Standards (APS) Amendment Act, 2023 (Act No. 12 of 2023) on 6 August 2025, as well as the publication of the Management Control System Regulation (R.6634 of 19 September 2025), which will come into operation 12 months after publication, in September 2026.

Industry members were also informed of the Department's request for applications for the registration of Management Control Systems by manufacturers of regulated agricultural products, including dairy products, where labels will carry claims such as "Organic" or "rBST-free" once the regulation comes into effect. The Department has encouraged affected manufacturers to submit their registration applications to the Office of the Executive Officer on or before 31 March 2026 to ensure a smooth regulatory compliance transition. Relevant documentation circulated was included.

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

1. AFRICAN ORGANISATION FOR STANDARDISATION (ARSO)
South Africa participated in the development, review, and editing of standards across multiple working groups, contributing to more than 60 standards under discussion through Mrs. Anneke van Niekerk on behalf of the project manager. Particular attention was given to ensuring alignment with Codex standards and national regulations.
During the third quarter, South Africa formally indicated non-support for a proposed ARSO maximum limit of 1 µg/kg for Aflatoxin M1 in milk, recommending alignment with Codex and the anticipated national limit of 0.5 µg/kg to ensure regulatory consistency and scientific justification. In the fourth quarter, the Department of Health confirmed that the anticipated national limit of Aflatoxin M1 in the forthcoming regulation is 0.5 µg/kg, in alignment with Codex standards.

2. CODEX ALIMENTARIUS
Engagement with Codex Alimentarius processes continued throughout 2025 via the South African Codex National Contact Point and the IDF Standing Committees. Comments were submitted on several Codex documents, including proposed revisions to guidelines on food hygiene, water reuse in food production, control of Listeria monocytogenes and viruses in foods, and the Codex General Standard for Food Additives (GSFA).
Milk SA submitted support the use of specific food additives in defined dairy applications, such as the colourant Jagua (genipin-glycine) blue and the emulsifier Polyglycerol Esters of Fatty Acids. Contributions were made to Codex discussions to safeguard the appropriate use of dairy terms and to ensure science-based regulatory outcomes.

3. INTERNATIONAL DAIRY FEDERATION (IDF)
Milk SA actively participated in IDF Standing Committees throughout 2025, whose work, among other objectives, is aimed at safeguarding the use of dairy terms by ensuring alignment of various Codex standards with the Codex General Standard for the Use of Dairy Terms. This participation also encompassed committees on food additives, standards of identity and labelling, and analytical methods. Submissions were made on behalf of the South African National Committee of the IDF, including concurrence with the IDF position not to support the development of a separate Codex standard for camel milk.
Mrs. Anneke van Niekerk, representing Milk SA on behalf of the project manager, participated in IDF activities by attending the IDF World Dairy Summit 2025 held in Santiago, Chile, together with the corresponding IDF Business Meetings.

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

Consultation and liaison with relevant stakeholders and key role-players were undertaken through Milk SA's established organisational structures, including engagement with the Milk SA Programme Manager: Animal Health & Welfare and the Milk SA Programme Manager: Environmental Sustainability on regulatory matters relating to animal identification and waste information.

The organised dairy industry was consulted for comments on the following:

1. Proposed New Regulations relating to the Identification of Animals (R.6091 of 4 April 2025)

2. Proposed New Regulations for the Exportation of Live Animals by Sea (R.6400 of 11 July 2025)

3. Proposed Second Draft Amendment of the Dairy and Imitation Dairy Products Regulations under Notice for the request of public comments, R.6501 of 15 August 2025.

No Non-achievements / underperformance has been reported

Goal 5 - Report to industry via Milk SA structures

Achievements

Project management activities were communicated to the industry in a clear and effective manner through Milk SA's communication strategy, including the use of the SAMPRO and MPO platforms where applicable.

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

Maintaining effective and collaborative relationships with relevant parastatals remains essential to advancing Milk SA's overarching strategic objectives and mitigating potential project risks. Ongoing liaison, including engagement with the Department of Agriculture, Directorate: Animal Production, was undertaken to communicate Milk SA's concerns regarding the new Animal Identification Regulation. The continued commitment of the project team has resulted in sustained recognition from government structures and industry associations beyond the Milk SA organisation, contributing directly and indirectly to the achievement of Milk SA's strategic objectives as well as those of the respective government bodies.

No Non-achievements / underperformance has been reported

Income and expenditure statement

Income and expenditure statement	2025 Annual Statements - PRJ0407.pdf
Unnecessary spending during period	No

Popular Report

RS popular report - Annual Report 2025.docx

Popular report and Additional documentation

National Residue Monitoring Programme.xlsx
Annexure-E of VPN 20.pdf

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