



## ***Regulations and Standards Project of Milk SA***

(PRJ-0407-2025)

### ***Dairy Standard Agency***

**Quarter 3 2025** (July 2025 till September 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 – FOODSTUFFS, COSMETICS AND DISINFECTANTS ACT – DIRECTORATE: FOOD CONTROL**

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

The process of collating comments received on this draft together with the incorporation of some of the comments received is still ongoing. Correspondence has been received from the Department of Health: Director Food Control that extensive work has been accomplished to complete the work. Date of completion has not been confirmed.

###### **1.2 Review of the “Regulations relating to milk and milk products” (R.1555 dated 21 November 1997)**

The draft proposed amendment regulation has been circulated internally to the industry expects on dairy microbiology for inputs and comments before being submitted to the Department of Health. The specifications in the draft proposed amendment were updated based on the outcome of the research (Milk SA funded) done by the Dairy Standard Agency (DSA) staff member. The research was based on the risk assessment to determine the significance of E. coli and coliforms as indicator organisms of hygiene and food safety in milk in South Africa.

##### **2. DEPARTMENT OF AGRICULTURE – AGRICULTURAL PRODUCT STANDARDS ACT**

###### **2.1 Directorate: Food Safety and Quality Assurance**

###### **2.1.1 Agricultural Product Standards (APS) Amendment Act, 2023 (Act No. 12 of 2023)**

The Agricultural Product Standards Amendment Act, 2023, published on 3 April 2024, was proclaimed into operation as of 6 August 2025 on the date of the publication of the Proclamation of 279 of 2025.

###### **2.1.2 Draft Amendment of the Dairy and Imitation Dairy Regulation R.1510 of 22 November 2019**

The Directorate: FSQA of the Department of Agriculture (DOA) published Notice 6051 on 15 August 2025 requesting comments on the second draft amendment Dairy and Imitation Dairy regulation. It must be highlighted that almost all the comments submitted by Milk SA on the first draft amendment Dairy and Imitation Dairy regulation were captured in the second draft amendment.

Milk SA through the teamwork of the Dairy Technical Working Group and in consultation with the industry submitted comments with the commenting period which had a closing date on 30 September 2025.

### **2.1.3 New Regulations relating to the Management Control System in respect of the Sale and Export of Certain Agricultural Products (R.6634 dated 19 September 2025)**

The Management Control System Regulation (R.6634/2025) is intended to establish a regulatory framework for the use of management control systems (MCS) which are methods of production that may be claimed on the labels of agricultural products regulated under the Agricultural Product Standards Act. Under this regulation, any claim relating to a management control system that is marked on a regulated agricultural product whether sold locally or intended for export, must be registered with the Executive Officer and is subject to auditing by designated assignees to ensure that such claims are credible, traceable, and verifiable. It was introduced to ensure that consumers are not misled by product labels that make claims about specific methods of production which are false and cannot be substantiated. Examples of management control systems include 'organic', 'free-range', 'pasture-fed', and 'grass-fed' production methods.

The MCS regulation will come into operation 12 months after publication, in September 2026.

## **2.2 Directorate: Animal Health**

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

A comprehensive document on the National Residue Monitoring Programme (NRMP) has been compiled and submitted to the State Veterinarian within the Import/Export Policy Unit of the Directorate: Animal Health for consideration. The submitted programme outlines China's specific requirements and highlights both the control measures already implemented in South Africa and the additional measures identified by China. The document is currently under review by the Department of Agriculture.

The **Department of Agriculture (DoA)** has identified **exports to China as a priority**.

### **2.2.2 Veterinary Procedural Notice 20 (VPN 20)**

The VPN 20 was originally compiled in April 2010 and subsequently amended in November 2024. It consists of annexures outlining the requirements for exports to various countries which have been completed. Annexure E that deals with exports to China was completed and circulated to industry members. Final arrangements are being made with the Directorate: Animal Health, Import Export Policy Unit to enlighten industry members regarding the interpretations of Annexure E in the context of the VPN 20.

### **2.2.3 Foot-and-Mouth Disease (FMD) Outbreak**

DSA collaborated with Drs Mark Chimes and Anthony Davis as well as other role players established the Foot and Mouth Disease (FMD) Work Group to assist in finding solutions for management control in the KZN FMD area. Milk SA Work Group have been included in the Task Team on Controlled Animal Diseases initiated by the Minister that was announced on 1 Sep 2025.

The latest FMD reports as received from the Directorate Animal Health were noted and also circulated via Milk SA to the organised dairy industry.

## **3. CONSUMER GOODS COUNCIL OF SOUTH AFRICA (CGCSA)**

The Dairy Standard Agency as member of the CGCSA attended the FSSI Compliance Committee Meeting to discuss the 2025 Plans from the FSSI pillars namely Health and Wellness, Food Loss and Waste, Safety and Quality, Trade Sustainability

## **4. SOUTH AFRICAN BUREAU OF STANDARDS (SABS)**

Following the nomination of **Mrs Anneke van Niekerk**, representing **Milk South Africa** and contracted on behalf of the project manager to participate in **SABS** activities, as **Chairperson of SABS TC 034/SC05**, there were **no notable developments recorded during the third quarter**. The only activity of relevance was the **circulation of an invitation to the Annual Meeting of SABS TC 70 (Legal Metrology)**, scheduled to take place on **26 November 2025**. In addition correspondence from the following technical committees were followed

ISO/TC 34 “Food products”	Reader	ISO
ISO/TC 34/WG 14 “Vitamins, carotenoid and other nutrients	Reader	ISO
ISO/TC 34/SC 5 “Milk and milk products”	Reader	ISO
ISO/TC 34/SC 9 “Microbiology”	Reader	ISO
ISO/TC 34/SC 10 “Animal feeding stuffs”	Reader	ISO
ISO/TC 34/SC 17 “Management systems for food safety”	Reader	ISO
SABC/TC 0034 “Food products”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 05 “Dairy products”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 09 “Microbiological evaluation of foods, feeds and beverages”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 10 “Hygiene practices in animal feed manufacturing”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 11 “Animal and vegetable fats and oil”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 17 “Hygiene practices in the food industry”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 17/WG 01 “SANS 10330 Requirements for a Hazard Analysis and Critical Control Point”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 17/WG 02 “SANS 10049 Food safety management – Requirements for prerequisite program”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 17/WG 3 “SANS 10156 Handling of chilled and frozen foods”	Contributor	SABS – Technical groups
SABC/TC 0034/SC 17/WG 4 “SANS 10330”	Contributor	SABS – Technical groups
SABS/TC 0070 “Legal metrology”	Contributor	SABS – Technical groups
SABS/TC 0070/SC 04 “Sale of goods”	Contributor	SABS – Technical groups

## **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**

Industry members were 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, together with 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. Relevant information was circulated to all stakeholders.

In addition, comments were requested from stakeholders on the second draft amendment of the Dairy and Imitation Dairy Regulations, as published under Notice 6051 of 15 August 2025. The comments received were collated and submitted to the Department of Agriculture for consideration.

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

## **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)**

During the third quarter, ARSO TC 04 (Milk and Milk Products) circulated the following draft standards for comment:

**CD ARS 1033:2024** – *Pasteurised Milk – Specification*

**CD ARS 1035:2024** – *Sterilised Milk – Specification*

**CD ARS 1036:2024** – *Code of Hygienic Practice for Milk and Milk Products*

In addition, a **proposed ARSO standard** establishing a **maximum limit of 1 µg/kg for Aflatoxin M1 in milk** was circulated for comments. South Africa is to submit its position indicating non-support for this proposed limit.

This position is based on the fact that the **national regulation**, *Regulations Governing Tolerance for Fungus-Produced Toxins in Foodstuffs* (R.1145 of 8 October 2004), currently prescribes a **maximum level of 0.05 µg/ℓ** for Aflatoxin M1 in milk. Furthermore, the **Directorate: Food Control** of the Department of Health, in line with the **amended Codex General Standard for Contaminants and Toxins in Food and Feed (GSCTFF, 2024)**, has published a **draft amendment** to the national regulations – *Regulations Relating to Maximum Levels of Mycotoxins in Foodstuffs* (R.5055 of 1 November 2024) – proposing a **revised limit of 0.5 µg/ℓ** for Aflatoxin M1 in milk.

Although this draft amendment is still to be finalised and gazetted, it is well recognised that **South African policy makers aim to harmonise national food regulations with Codex standards**. It can therefore be anticipated that the final regulation will prescribe a maximum limit of **0.5 µg/kg** for Aflatoxin M1 in milk.

Accordingly, **South Africa does not support** the proposed ARSO maximum limit of **1 µg/kg** for Aflatoxin M1 in milk and **recommends alignment with the Codex standard** to ensure regulatory consistency and scientific justification.

The following 7 Draft African Standards (DARS) and 11 Final Draft African Standards (FDARS) under ARSO/TC 04 Technical Committee on Milk and Milk Products were worked on during the

3rd quarter, which have been circulated for balloting and members members comments:

4.1 Draft African Standard (DARS) for Enquiry stage 60 days (10th October – 10th December 2025):

1. DARS 1040:2025: Feta cheese — Specification
2. DARS 1048:2025, Dairy Ice Cream — Specification
3. DARS 1049:2025, UHT milk Specification
4. DARS 2130:2025, Tilsiter cheese Specification
5. DARS 2131:2025, Cottage cheese Specification
6. DARS 2132:2025, Gouda cheese Specification
7. DARS 2133:2025, Brie cheese Specification

Final Draft African Standards (FDARS) for balloting 30 days (10th October to 10th November 2025):

FDARS 1034:2025, Milk and milk products — Glossary of dairy terms  
FDARS 1084: 2025, Cream and prepared creams — Specification  
FDARS 1085: 2025, Blend of evaporated skimmed milk and vegetable fat — Specification  
FDARS 1086:2025, Blend of sweetened condensed milk and vegetable fat — Specification  
FDARS 1087:2025, Dairy fat spreads- Specification  
FDARS 1088:2025, Dairy Permeate powders- Specification  
FDARS 1089:2025, Milkfat products- Specification  
FDARS 1090:2025, Sweetened condensed milks- Specification  
FDARS 1091:2025, Whey powders – Specification  
FDARS 1093: 2025, Butter- Specification  
FDARS 1353:2025, Edible casein products- Specification

## 2. CODEX ALIMENTARIUS

In response to the request for additional comments on the Electronic Working Group (EWG) Second Circular of the Codex General Standard for Food Additives (GSFA), the following submissions were made to the South African Codex Contact Point in the Department of Health in support of the use of specific food additives:

Colourant: Jagua (genipin-glycine) blue, at a proposed maximum limit of 160 ppm (ML) in flavoured fluid milk drinks and flavoured yoghurt that comply with the Standard for Fermented Milks (CXS 243-2003), without including the notice “XS243: Excluding products conforming to the Standard for Fermented Milks”; and

Emulsifier: Polyglycerol Esters of Fatty Acids, at a maximum level of 2000 mg/kg in flavoured fluid milk drinks, pasteurised plain cream and clotted plain cream, and at a maximum level of 5000 mg/kg in processed cheese.

## 3. INTERNATIONAL DAIRY FEDERATION (IDF)

The following comment was submitted on behalf of the South African National Committee of the IDF to the IDF Standing Committee on Standards of Identity and Labelling that South Africa concurred with the IDF's position not to support the development of a separate Codex Standard for Camel Milk, based on the rationale that the existing Codex standards for milk and milk products are also applicable to camel milk and its products.

As per the Milk SA contractual agreement all relevant correspondence and comments, where applicable, were shared with Milk SA and industry stakeholders.

***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 with relevant stakeholders and engagement with key role-players were conducted through the established Milk SA organisational structures.

***No Non-achievements / underperformance has been reported***

**Goal 5 - Report to industry via Milk SA structures**

***Achievements***

Project management activities were effectively communicated to the industry through the Milk SA communication strategy.

***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 sound relationships with relevant parastatals remains essential to supporting the overarching strategic goals of Milk SA and to mitigating potential project risks. The continued commitment of the project team has resulted in sustained recognition from both government structures and industry associations beyond the Milk SA organisation, thereby contributing directly and indirectly to the achievement of Milk SA's strategic objectives and those of the respective government bodies.

***No Non-achievements / underperformance has been reported***

**Income and expenditure statement**

Income and expenditure statement	<a href="#">PRJ-0407.pdf</a>
Unnecessary spending during period	No

**Popular Report**

[RS popular report Q3 2025 - Final \(6\).docx](#)

**Popular report and 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