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The guideline provides an overview of the audit process and verification of member conformance with the AFMA Code of Conduct. Compliance with the Code of Conduct is a prerequisite for AFMA membership

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1 INTRODUCTION

AFMA developed a Code of Conduct (CoC) as a measure of self-regulation in the feed industry in South Africa. The Code of Conduct comprises twelve areas of conformance and illustrates the vision of the feed industry in South Africa to develop a sustainable industry that acts responsibly within the food chain by ensuring safe feed for safe food.

Conformance to the Code of Conduct is audited by an independent assessment body, appointed by AFMA, and compliance is a prerequisite for Full and Associate membership. Following the adoption of the Code of Conduct by the Annual General Meeting in September 2007, it has been implemented by all AFMA members since 2010. The audit is performed at each AFMA member facility every two years to maintain a continuous cycle of compliance in the industry.

2 THE AFMA CODE OF CONDUCT

The requirements of the Code of Conduct include the following twelve (12) areas of conformance and all Full Members and Associate Members of AFMA commit to abide by this Code.

1. *AFMA members shall meet all legal requirements in terms of the Fertilizer, farm feeds, agricultural remedies, and stock remedies Act (Act 36 of 1947).*
2. *AFMA members shall meet the requirements of Good Manufacturing Practice (GMP) to ensure feed safety.*
3. *AFMA members shall recognise the importance of a Feed Safety Management System and adopt the relevant procedures.*
4. *Animal feed recommendations and formulations shall be carried out by professional animal scientists registered with the South African Council for Natural Scientific Professions (SACNASP).*
5. *AFMA members shall comply with the Basic Conditions of Employment Act.*
6. *AFMA members shall acknowledge the AgriBEE Sector Code of Good Practice from the Broad-Based Black Economic Empowerment Act.*
7. *AFMA members shall comply with the Occupational Health and Safety Act.*
8. *AFMA members shall comply with the Consumer Protection Act with specific reference to consumers' rights to a fair, accessible, and sustainable marketplace and clear identification and labeling of GMO products.*
9. *AFMA members shall promote compliance with the Competition Act acknowledging, underwriting, and promoting the AFMA anti-competitive statement.*
10. *AFMA members shall comply with the legal requirements of all relevant legislation to not bring the Industry, Association, or its members into disrepute.*
11. *AFMA members shall make their facilities available for auditing for conformance to the AFMA Code of Conduct by an assessment body appointed by AFMA.*
12. *AFMA members shall comply with the MAIN OBJECT of AFMA as stipulated in its Memorandum of Incorporation – “The main object of the Company is to promote the interests of its members and those of the animal feeds industry and the community insofar as they relate to each other”.*

2.1 Code of Conduct – Important Facts

- 1) The audit is conducted under the following categories:
 - A. Manufacturers of compound animal feed
 - B. Manufacturers and suppliers of feed additives, premixtures, stock remedies, and in-feed veterinary medicine
 - C. Manufacturers and suppliers of raw materials
- 2) An audit checklist was developed for each of the categories following the requirements of the AFMA Code of Conduct, including regulatory requirements, good manufacturing practices, and feed safety management requirements.
- 3) Conformance with the AFMA Code of Conduct is verified by an independent assessment body as appointed by AFMA, and the member audits are conducted in accordance with the approved audit checklist.
- 4) Only AFMA members are eligible for a Code of Conduct audit at their manufacturing or storage facilities to verify conformance and to maintain AFMA membership. AFMA members are required to reference their *unique membership identification number* when requesting an audit from the assessment body.
- 5) A certificate of conformance to the AFMA Code of Conduct is issued to all members that are found compliant, and it is valid for two (2) years.
- 6) Members are encouraged to conduct internal audits with similar criteria in the alternating years between the AFMA Code of Conduct audits conducted by the external auditors.
- 7) On-site audits are required for all AFMA member establishments where animal feed products are handled, manufactured, and/or stored, but it is not mandatory to do on-site audits of office buildings where documents are kept. Members should arrange for a responsible person to be available at the establishment, and to provide all relevant documentation for the auditor on-site (Act36 registrations, SOPs, etc.). Alternative arrangements (i.e., to audit a head office for procedures, policies, and registrations) should be made directly with the assessment service provider.
- 8) Warehouses used for the storage of registered animal feed products form part of product traceability and the supply chain and are mandatory inclusions for AFMA member Code of Conduct audits. Compliant warehouses will be acknowledged on the conformance certificate issued to members.
- 9) Manufacturing facilities must apply individually for AFMA membership to receive a membership number and be eligible for a conformance audit against the Code of Conduct. Manufacturing facilities include establishments that make, mix, formulate, compound, process, package, and label animal feed for sale [Act36 of 1947].
- 10) AFMA allows for remote audits under certain circumstances and for the following specific membership categories.

Member Category	ELIGIBILITY OF COMPANIES*	FREQUENCY OF REMOTE AUDITS
Direct Distributors / Traders (Associate Members)	<ul style="list-style-type: none"> involved solely in distribution of feed products does not include manufacturing activities does not include warehousing activities 	<ul style="list-style-type: none"> every audit after initial on-site audit
SADC-Based Manufacturers (Full Members)	<ul style="list-style-type: none"> located in neighbouring SADC countries does not export feed products to South Africa exempted from South African legislation 	<ul style="list-style-type: none"> every alternate audit

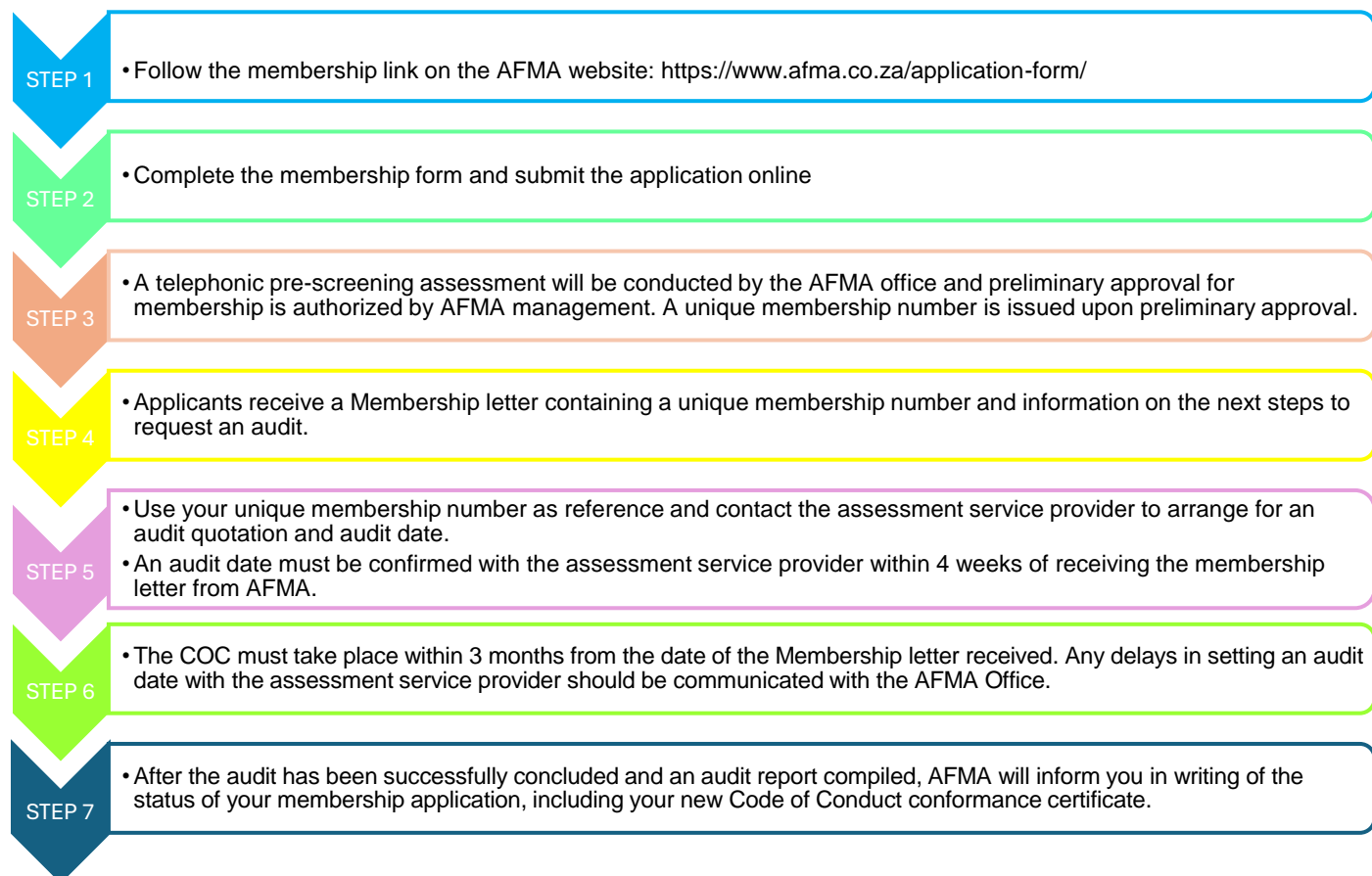
* eligibility will be confirmed in writing and is based on pre-screening information and prior audit reports.

- 11) AFMA member companies of which ALL the applicable manufacturing facilities are found compliant with the Code of Conduct will be acknowledged with an additional AFMA Group Member Code of Conduct certificate.

3 AFMA MEMBERSHIP APPLICATION & AUDIT PROCESS

3.1 New member application

New members can apply for AFMA membership by following the steps below.



3.2 Renewal application

Current members that want to request a Code of Conduct audit for the renewal of AFMA membership can follow the same steps as New members in 3.1 above, but using a special link for the Renewal audits at Step 1: <https://www.afma.co.za/membership-renewal-application/>

3.3 Assessment body Audit process

The below process is followed by the assessment service provider that is appointed by AFMA to audit its members for conformance with the Code of Conduct.

i. **Predetermination phase**

This phase covers the interviews with prospective clients, and an audit quote concerning the expected audit activities to be performed at the establishment according to the requirements of the AFMA Code of Conduct.

- ii. **Preliminary analysis**
Auditors perform a preliminary analysis to facilitate the practical implementation of the audit protocol based on the information obtained in the predetermination phase.
- iii. **On-site Audit**
Auditors visit the identified establishment in-person to perform an audit for conformance with the Code of Conduct audit protocol.
- iv. **Reporting phase**
Results of the audit, including on-site findings and documents/ evidence obtained for verification, are transferred to an AFMA Audit report.
- v. **Remedial phase**
The auditor evaluates and records all evidence submitted by the client for addressing the non-conformance(s) within the agreed time frame in a Clearance of Findings report.
- vi. **Final Recommendation phase**
The auditor signs off the audit report when satisfied that all requirements have been met and the non-conformances have been addressed. The auditor submits the audit reports to AFMA with a final recommendation on compliance.

3.4 Audit certificate & compliance logo

Upon confirmation of compliance, AFMA issues a Code of Conduct certificate to members. The certificate is valid for two (2) years after which a re-evaluation of the establishment is required. Compliant members also receive a Code of Conduct logo for their use on the company website, stationery, product packaging, and promotional material. The logo symbolizes the commitment of the animal feed manufacturers and suppliers of feed ingredients towards the safe feeding of animals and promoting safe food for all.



4 CODE OF CONDUCT AUDIT CRITERIA

4.1 Audit criteria per category

The audits are conducted under the following **categories** related to AFMA membership:

- A. Manufacturers of compound animal feed (Full members)
- B. Manufacturers & suppliers of feed additives, premixtures, stock remedies, and in-feed medication (Associate members)
- C. Manufacturers and suppliers of raw materials (Associate members)

The audit criteria for all the categories are based on the requirements of the AFMA Code of Conduct and covers the twelve (12) areas of conformance (See [Chapter 2](#)). The audit criteria for the individual categories are, however, adapted according to the specific feed manufacturing and/or handling practices at the establishment.

The following three (3) audit criteria cover the audit scope of the AFMA Code of Conduct:

- A. Manufacturers of compound animal feed
- B. Manufacturers & suppliers of feed additives, premixtures, stock remedies, and in-feed medication
- C. Manufacturers and suppliers of raw materials

A. Manufacturers of compound animal feed

Full members of AFMA that manufactures compound animal feed must verify compliance to the following applicable audit criteria:

- I. **Compliance with the relevant legal requirements about operational activities**
Verify compliance with the Act 36 of 1947 farm feed regulations, with specific evidence provided for:
 - a. Access control and vehicle identification
 - b. Suitability, maintenance, fencing, and condition of premises
 - c. Biosecurity measures
 - d. Storage, registration (certificates), and identification (label) of feed ingredients used
 - e. Storage, registration (certificates), use, and identification (label/ bag tag) of stock remedies used
 - f. Storage, registration (certificates), and identification (label) of manufactured animal feed product
 - g. Establishment requirements
 - h. Quality control on raw materials and manufactured animal feeds (specifications, analysis schedules/-results)
 - i. Use of products of animal origin (where applicable)
 - j. Labeling & identification of bulk feed deliveries (Section 9 invoice)
 - k. Custom mixes, including signed customer request
 - l. Prescriptions for use of veterinary medication, including stock management and documentation (prescriptions)
 - m. All records with regards to traceability
- II. **Meet the requirements of Good Manufacturing Practice (GMP) to ensure feed safety.**
Verify that the requirements of Good Manufacturing Practices (SANS 489:2009) are being met.
- III. **Recognition of the importance of a Food Safety Management System (FSMS) and adoption of relevant procedures**
Verify that the principles of a Food Safety Management System (HACCP / ISO 22000 / FSSC 22000) are adopted and implemented. Certification for any recognized FSMS will be acknowledged during the CoC facility audit.
- IV. **Animal feed recommendations and formulations must be carried out (or under supervision of) a professional Animal Scientist that is registered with the South African Council for Natural Scientific Professions (SACNASP).**
Verify that technical animal feed formulation & nutritional advice is provided under the supervision of a qualified & professionally registered Animal Nutritionist.
- V. **Compliance with the Basic Conditions of Employment Act.**
Verify compliance with the requirements.
- VI. **Acknowledgement of the AgriBEE Sector Code of Good Practice from the Broad-Based Black Economic Empowerment Act.**
A Statement of Acknowledgement is to be signed as confirmation of conformance.
- VII. **Compliance with the Occupational Health and Safety Act.**
Verify compliance with the requirements.
- VIII. **Compliance with the Consumer Protection Act with specific reference to consumers' rights to a fair, accessible, and sustainable marketplace.**
Verify compliance with the requirements by proof of clear identification and labeling of GMO products.
- IX. **Compliance and promotion of the Competition Act.**
Verify acknowledgement and underwriting of the AFMA anti-competitive statement.

B. Manufacturers & suppliers of Feed Additives, Premixtures, Stock remedies & in-feed medicine.

Associate members of AFMA that manufacture or trade in Feed Additives, Premixtures, Stock remedies, and in-feed medication must verify compliance to the following applicable audit criteria:

I. **Compliance with the relevant legal requirements regarding operational activities**

Verify compliance with the Act 36 of 1947 farm feed regulations, with specific evidence provided for:

- a. Access control and vehicle identification
- b. Suitability, maintenance, fencing, and condition of premises
- c. Biosecurity measures
- d. Storage, registration (certificates), and identification (label) of feed ingredients used
- e. Storage, registration (certificates), use, and identification (label/ bag tag) of stock remedies used
- f. Storage, registration (certificates), and identification (label) of manufactured feed product
- g. Establishment requirements
- h. Quality control on feed ingredients and manufactured feed products (specifications, analysis schedules/- results)
- i. Use of products of animal origin (where applicable)
- j. Prescriptions for use of veterinary medication, including stock management and documentation (prescriptions)
- k. All records with regards to traceability

X. **Meet the requirements of Good Manufacturing Practice (GMP) to ensure feed safety.**

Verify that the requirements of Good Manufacturing Practices (SANS 489:2009) are being met.

XI. **Recognition of the importance of a Food Safety Management System (FSMS) and adoption of relevant procedures**

Verify that the principles of a Food Safety Management System (HACCP / ISO 22000 / FSSC 22000) are adopted and implemented. Certification for any recognized FSMS will be acknowledged during the CoC facility audit.

XII. **Animal feed recommendations and formulations must be carried out (or under supervision of) a professional Animal Scientist that is registered with the South African Council for Natural Scientific Professions (SACNASP).**

Verify that technical animal feed formulation & nutritional advice is provided under the supervision of a qualified & professionally registered Animal Nutritionist.

XIII. **Compliance with the Basic Conditions of Employment Act.**

Verify compliance with the requirements.

XIV. **Acknowledgement of the AgriBEE Sector Code of Good Practice from the Broad-Based Black Economic Empowerment Act.**

A *Statement of Acknowledgement* is to be signed as confirmation of conformance.

XV. **Compliance with the Occupational Health and Safety Act.**

Verify compliance with the requirements.

XVI. **Compliance with the Consumer Protection Act with specific reference to consumers' rights to a fair, accessible, and sustainable marketplace.**

Verify compliance with the requirements by proof of clear identification and labeling of GMO products.

XVII. **Compliance and promotion of the Competition Act.**

Verify acknowledgement and underwriting of the AFMA anti-competitive statement.

C. Manufacturers and suppliers of raw materials

Associate members of AFMA that manufactures OR trade in raw materials must verify compliance to the following applicable audit criteria:

I. **Compliance with the relevant legal requirements regarding operational activities**

Verify compliance with the Act 36 of 1947 farm feed regulations, with specific evidence provided for:

- a. Storage, handling, and access to raw materials,
- b. Identification (labeling) and registration (certificates) of raw materials,
- c. Identification of bulk storage products
- d. Labeling & identification of bulk feed deliveries (Section 9 invoice)
- e. Establishment requirements:
 - Access control, enclosure of premises, and vehicle identification
 - Biosecurity: Sterilising of incoming vehicles
 - Suitability, maintenance, and condition of the equipment
- f. Quality control on feed ingredients used and on manufactured/traded raw materials (specifications, analysis schedules/-results)
- g. Use of products of animal origin (where applicable)
- h. All records with regards to traceability, quality & sales

II. **Meet the requirements of Good Manufacturing Practice (GMP) to ensure feed safety.**

Verify that the requirements of Good Manufacturing Practices (SANS 489:2009) are being met.

III. **Compliance with the Basic Conditions of Employment Act.**

Verify compliance with the requirements of the Act as set out in sections 9 to 81.

IV. **Acknowledgement of the AgriBEE Sector Code of Good Practice from the Broad-Based Black Economic Empowerment Act.**

A *Statement of Acknowledgement* is to be signed as confirmation of conformance.

V. **Compliance with the Occupational Health and Safety Act.**

Verify compliance with the requirements.

VI. **Compliance with the Consumer Protection Act with specific reference to consumers' rights to a fair, accessible, and sustainable marketplace.**

Verify compliance with the requirements by proof of clear identification and labeling of GMO products.

VII. **Compliance and promotion of the Competition Act.**

Verify acknowledgement and underwriting of the AFMA anti-competitive statement.

5 NON-CONFORMANCE PROCEDURE (COMPLAINTS)

All AFMA members are bound by their commitment to compliance with the Code of Conduct and by the AFMA Memorandum of Incorporation. Should a complaint arise against any AFMA member or an AFMA appointed assessment service provider that is in contravention of the Code of Conduct or Memorandum of Incorporation, such a complaint can be lodged directly to the Executive Director of AFMA and submitted in writing to admin@afma.co.za.

Upon receipt of a written complaint, AFMA initiates the following procedure:

(a) **Validate complaint**

Complaints regarding feed safety matters, non-conformance with the Code of Conduct, or actions related to the assessment service provider will be addressed by AFMA according to its non-conformance procedure. Complaints received from a legal entity or natural person residing in South Africa will be addressed by AFMA.

(b) **Register complaint**

AFMA captures the initial complaint and creates a Customer Complaint File. AFMA may request additional information at this stage to substantiate the complaint.

(c) **Initial assessment of a complaint**

The AFMA Membership Committee evaluates the initial complaint and all available evidence, and finds the complaint to be either:

- i. not substantiated and lack grounds for further investigation, or
- ii. substantiated and warrants further investigation.

AFMA will inform the complainant in writing of the outcome of the initial assessment and ask the complainant (3 ii) to confirm that a full investigation is requested.

(d) **Investigation fee**

AFMA appoints an independent assessment body with a qualified auditor to conduct a full investigation of the complaint. ***A deposit of R30 000.00 will be required from the complainant to register the complaint at AFMA before a full investigation is conducted.*** The deposit will be used towards the costs of the investigation.

- i. Should the final investigation report indicate that the AFMA member is NOT in breach of the Code of Conduct, the full investigation cost will be for the complainant.
- ii. Should the investigation report indicate that the AFMA member is in breach of the AFMA Code of Conduct, the full investigation cost will be for the AFMA member's account, and the complainant will be refunded for the deposit.

(e) **Notification of complaint**

Where a further investigation is requested, and the required deposit amount was received from the complainant, AFMA informs the respective member of the complaint received against them and request full co-operation in the pursuing investigation. AFMA also informs the complainant in writing of the official status of the complaint and requests full co-operation in the pursuing investigation.

(f) **Investigation**

A feed safety auditor is appointed to investigate the alleged breach of compliance with the AFMA Code of Conduct and to compile an audit report on the findings. The report will include a Root Cause and a Corrective Action proposal where a transgression has been confirmed. The report is submitted to the AFMA Membership Committee consisting of the AFMA Executive Director, the AFMA Technical & Regulatory Manager, and the Membership Administrator for assessment.

(g) **Findings of investigation**

After consideration of the investigation report and all evidence submitted, the AFMA Membership Committee makes a final decision on the complaint received and notifies the complainant and the member in writing that:

- i. the member is not in breach of the AFMA Code of Conduct;
- ii. that the member was in breach of the AFMA Code of Conduct, indicating which clause(s) of the AFMA Code of Conduct was breached and the confirmed corrective action that has since been taken by the member; or

- iii. that the member has transgressed the AFMA Code of Conduct and corrective action will be requested to correct the transgression. The corrective action taken by the member must be approved by the feed safety auditor that conducted the investigation within three (3) months. Failure to comply with corrective actions may result in termination of membership.

(h) **Transgressed members**

AFMA members that are not able to /unwilling to restore their Code of Conduct status within three (3) months may be requested to meet with the Board of Directors and provide a final statement on their situation.

- i. Should the BOD find the members' statement to be adequate, valid, and in good faith, an agreement is reached regarding the outstanding findings to be addressed within an agreed timeframe.
- ii. Should the BOD find the members' statement to be inadequate, the BOD will terminate the membership.
- iii. Should the transgressed member not meet all the requirements of the Code of Conduct by the agreed date, the BOD will terminate the membership.

(i) **Reinstatement of membership**

A previous member of AFMA that either resigned or whose membership was terminated may reinstate their membership by re-applying online as a new member and undergoing a full Code of Conduct audit.

6 APPEALS

The appeal procedure maps the process operated by AFMA to receive, evaluate, and make decisions on appeals lodged by its Members. AFMA shall manage and take responsibility for all decisions at all levels of the appeals-handling process and shall ensure that the persons engaged in the appeals-handling process are different from those who were part of the audit process or were involved in the AFMA membership decision.

- (a) Lodging an appeal, its investigation, and subsequent decision shall not result in any discriminatory actions against the appealing person or company.
- (b) The appeals-handling process shall include the following actions:
 - 1) logging all appeals received;
 - 2) acknowledging receipt of the appeal;
 - 3) inform the appellant of the process that will be followed;
 - 4) validating and investigating the appeal;
 - 5) deciding what actions are to be taken in response to the appeal;
 - 6) tracking and recording appeals;
 - 7) ensuring that any appropriate correction and corrective action are taken;
 - 8) informing the appellant periodically of the progress regarding the appeal.
- (c) Where the appeal is lodged to dispute an AFMA membership/renewal of membership decision, a complete investigation shall be conducted by a person not previously involved in the subject of the appeal.
- (d) The appellant is responsible for the cost of the investigation and a deposit of R30 000 must be paid to AFMA before an investigation can commence. The fee will be refunded in full when the investigation outcome is in favor of the appellant.
- (e) The following shall be considered when investigating an appeal:
 - i. all objective evidence provided by the appellant;
 - ii. all objective evidence provided by the audit team;
 - iii. the requirements of the AFMA Code of Conduct Protocol and normative references;
 - iv. this may require that the investigating team may have to access the premises of the appellant to verify the submitted evidence to ensure conformance with the AFMA Code of Conduct and normative references.
- (f) AFMA shall notify the appellant in writing of the outcome of the appeal investigation and corrective action is taken, if appropriate.

***Important Note:** All information gathered, and documents collected during a complaint and appeal investigation will be handled in confidence by the AFMA Membership Committee, and whose members are bound by a confidentiality agreement with AFMA.*