

ACT 36 FARM FEED REGISTRATION WORKSHOP

THURSDAY, 26 MARCH 2026
IRENE COUNTRY CLUB, CENTURION

Registration Requirements for
Premixtures

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DoA - Act 36 of 1947

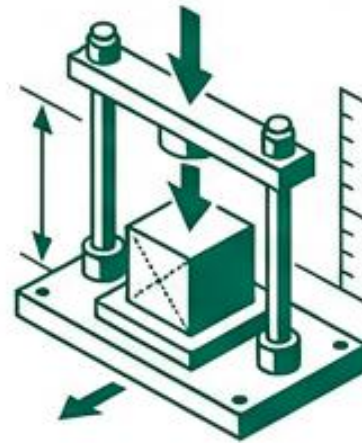


Clarifying the Classification



Define

Establish the precise classification and formulation anatomy under Section 28(1).



Prove

Demonstrate chemical and physical stability, homogeneity, and safety against undesirable substances.



Register

Assemble the comprehensive DAIC dossier across Administrative, Scientific, and Quality Management Systems.



Comply

Adhere strictly to post-market reference sampling and timeline mandates.

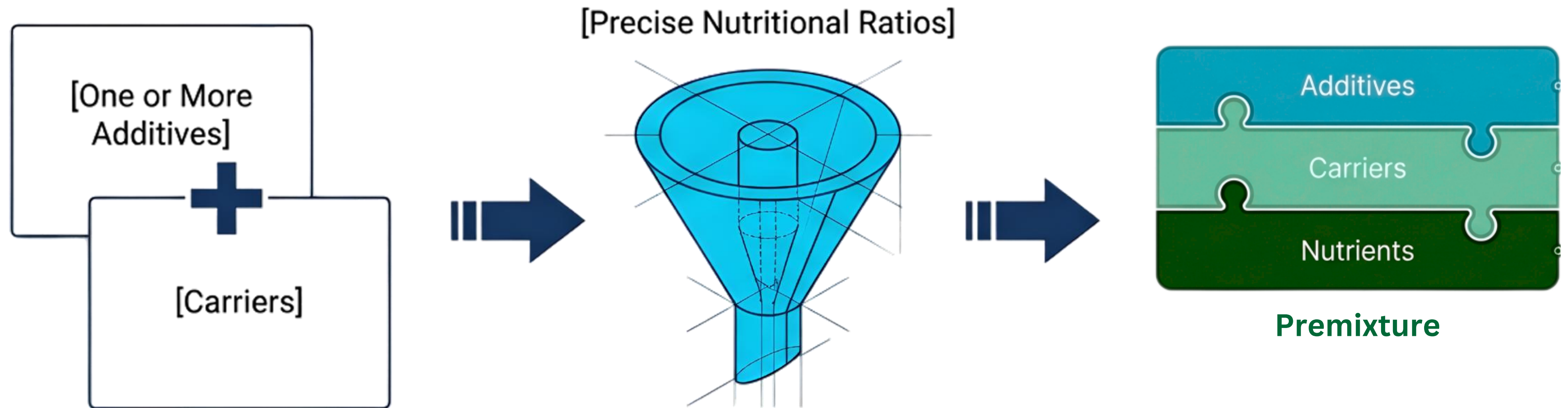


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The Anatomy of a Premixture



Core Legal Definition



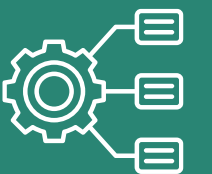
A product containing a mixture of additives or one or more additives with substances used as carriers, intended strictly for the manufacture of animal feeds.

The Nutritional Caveat



The product must contain nutrients or other ingredients in exact quantities and ratios designed to supply the prescribed requirements for the target animal species.

Product Classification



Under South African guidelines, these products can be registered either as a nutritional additive premixture or a nutritional feed additive.



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Clarifying the Classification

Additive

Identity: A single active substance belonging to a specific functional group (Technological, Sensory, Nutritional, Zootechnical)

Status: Must be added to another product before feeding. Registered for general use.

Premixture

Identity: A blended mixture of additives and carriers.

Status: Registered with DAIC. Intended for public sale to commercial feed manufacturers.

Custom Mix

Identity: A bespoke, client-specific blend formulated to a unique order.

Status: Unregistered. Strictly marked "Not for public sale". Cannot be sold to anyone other than the ordering client.

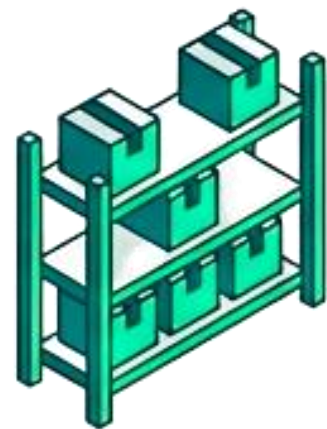
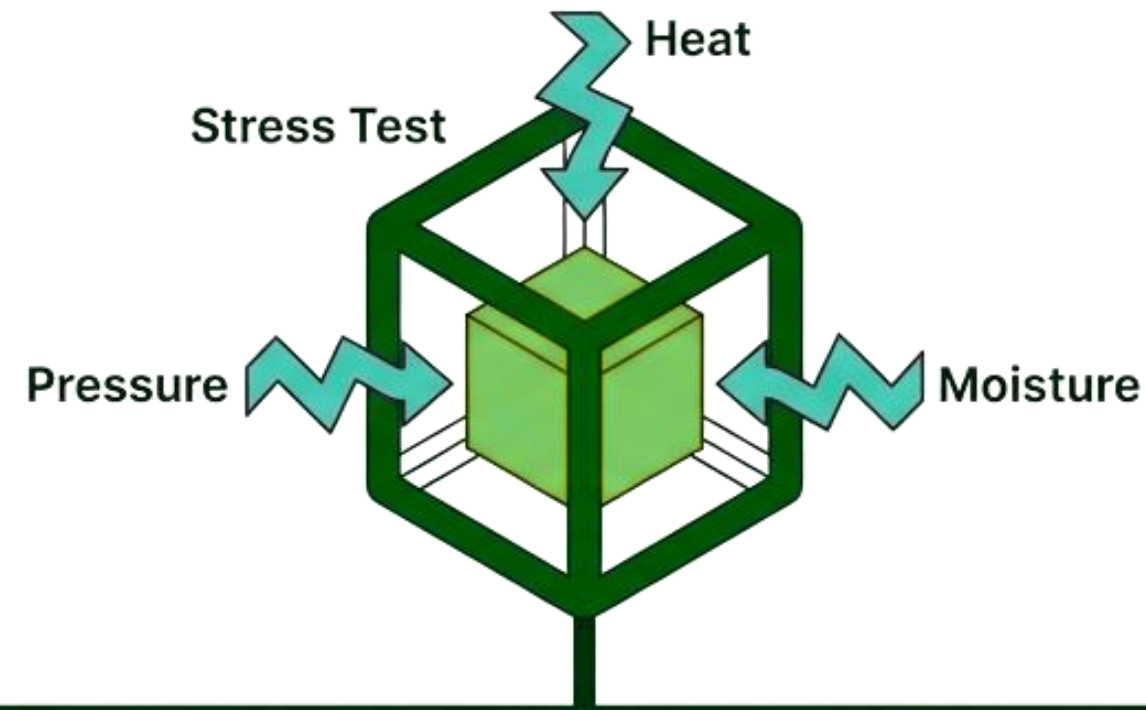


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Technical Prerequisite 1: The Stability Mandate



Storage Phase Stability

The applicant must provide scientific proof of the product's stability during storage of the premixture under defined conditions to establish a verified shelf life.



Preparation Phase Stability

The applicant must provide scientific proof that the premixture remains stable during the actual manufacture of the final animal feed. It must demonstrably withstand the heat, pressure, and moisture inherent in commercial feed processing without losing efficacy.

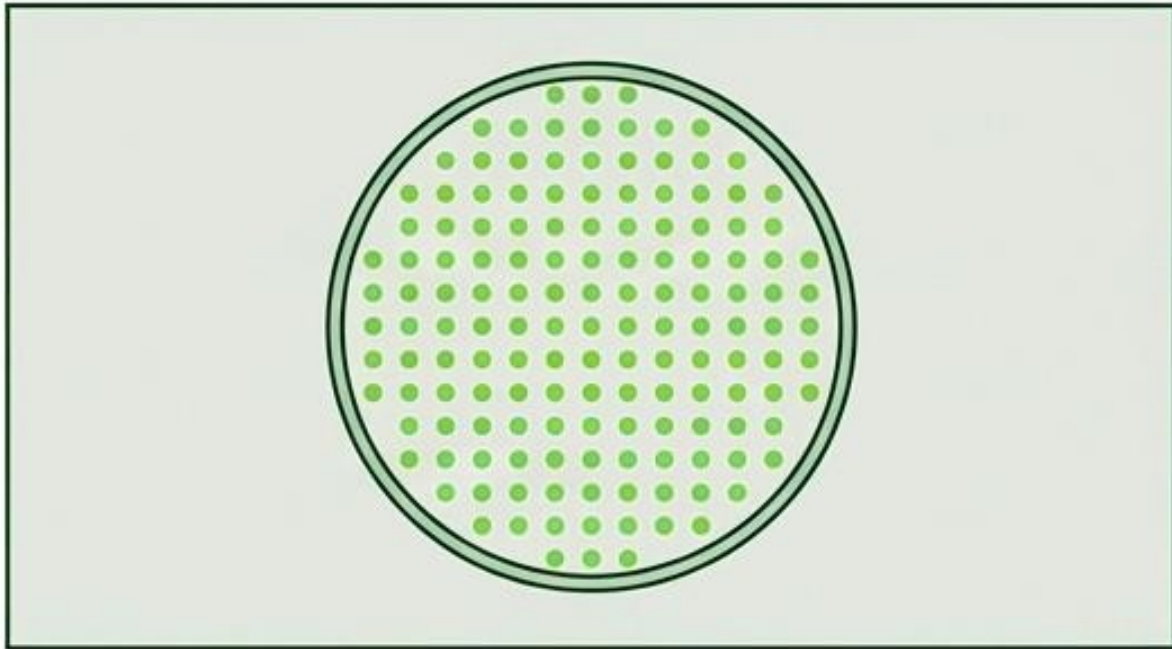


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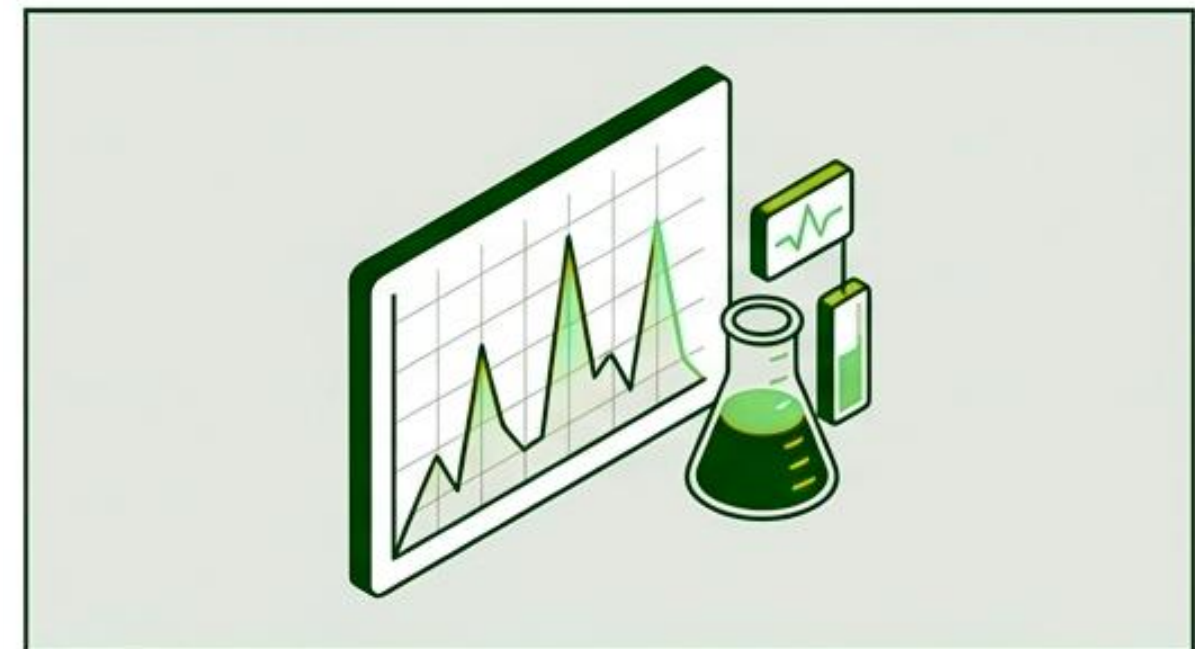


Technical Prerequisite 2: Homogeneity & Routine Control



Physical Homogeneity

The product must possess specific physicochemical and technological properties that guarantee it will form and maintain perfectly homogenous mixtures when integrated into the final feed.



Analytical Control Methods

Applicants must submit complete descriptions of the qualitative analytical methods designed specifically for routine control and measurement of the active additive(s) within the premixture and final feed.



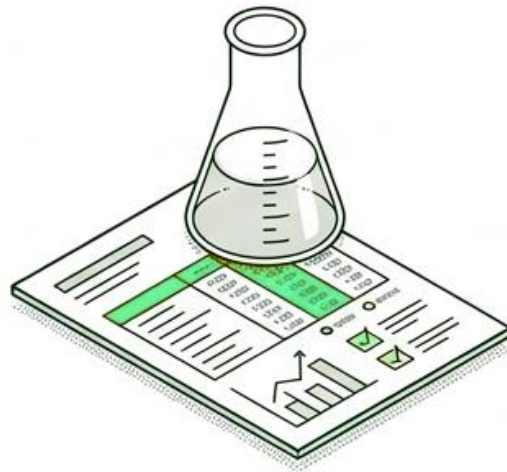
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Scientific & Labelling Proofs

Certificate of Analysis (CoA)



Analytical proof of composition. DAIC allows flexibility here: the CoA must cover either the final blended premix itself; OR the CoA of the individual active constituents of the premix AND Product Formulation.

Proposed Product Label



The exact commercial labelling intended for the market.

Critical rule: Must be submitted in duplicate.

SACNASP Certification



Official proof of registration with the South African Council for Natural Scientific Professions in terms of Act No. 27 of 2003, ensuring the science is backed by a registered professional.



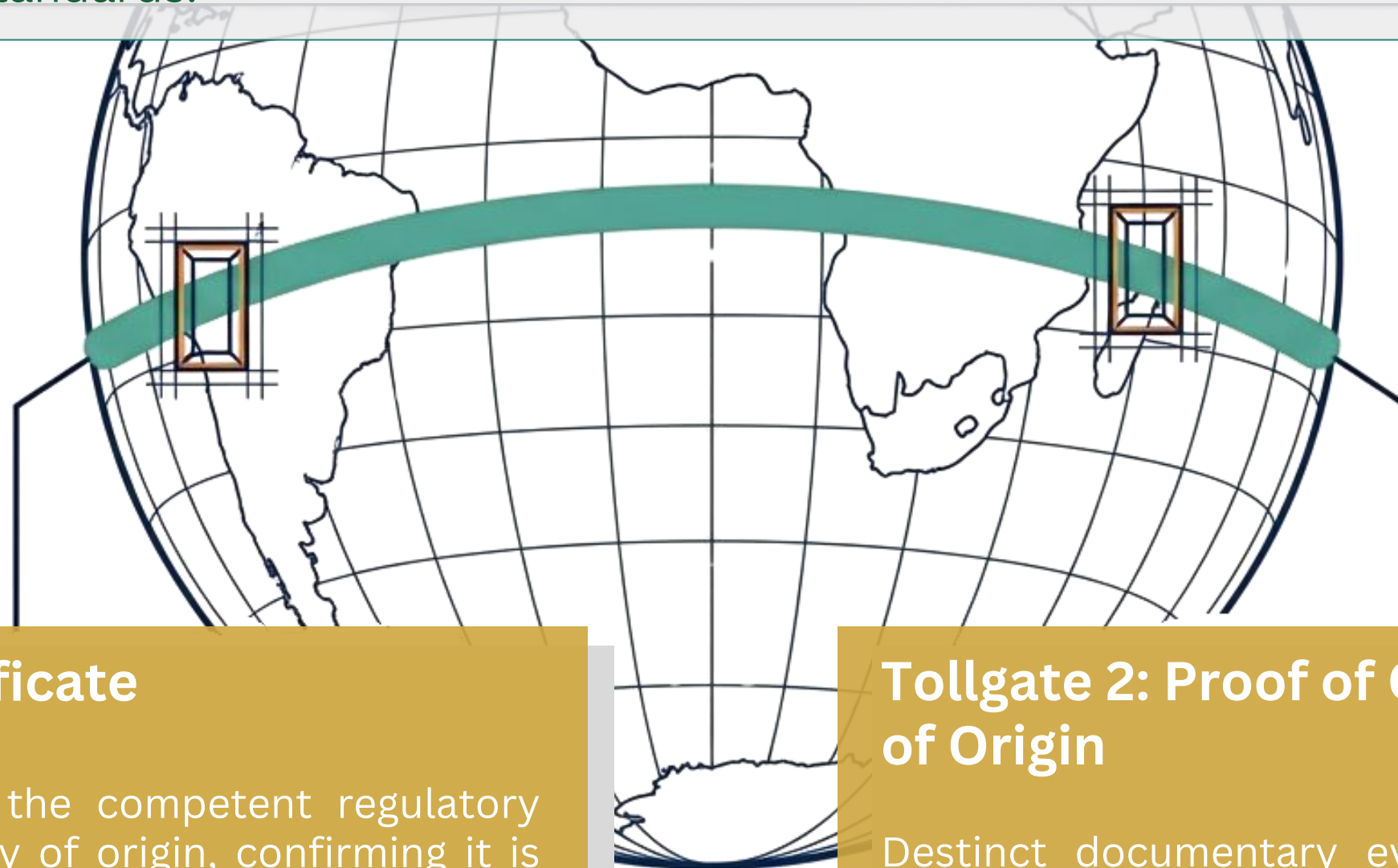
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Additional Tollgates for Imported Premixtures

Context: Foreign manufacturers face enhanced scrutiny under Section 4.1 (f) and 4.1 (g) to ensure imported products meet baseline domestic safety standards.



Tollgate 1: Free Sale Certificate

An official document issued by the competent regulatory authority in the product's country of origin, confirming it is legally permitted for sale in its home market.

Tollgate 2: Proof of Compliance from Country of Origin

Distinct documentary evidence providing the premixture fully complies with all relevant local feed and safety legislation in its country of origin.



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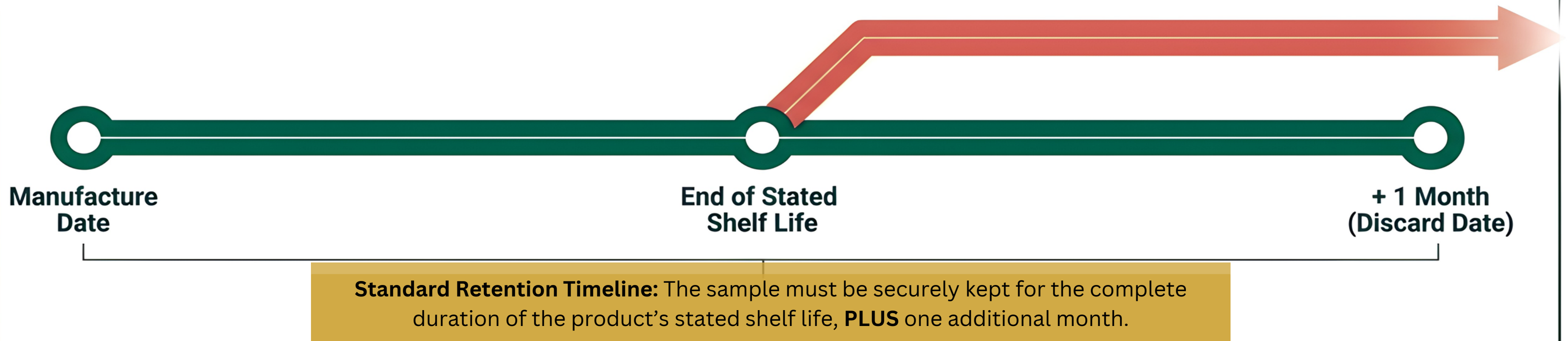
Post-Market Compliance: The Reference Sample Rule

The Mandate

Registration is not the end of compliance. Manufacturers are legally obligated to retain a physical sample of every manufactured premixture batch.

The Dispute Clause

If a regulatory, safety, or commercial dispute arises concerning the batch the standard timeline is voided. The sample must be retained until the dispute is officially resolved.



The Premixture Pre-Submission Checklist

Formulation & Testing

- Additives/carriers confirmed?
- Stability during storage proven?
- Stability during feed prep (heat/pressure) proven?
- Homogeneity control methods documented?
- Undesirable substances below Annexure 1 limits?

Administrative Dossier

- Service Request Form (FF/SRF_01) completed?
- Application Form in duplicate?
- Contact Details form included?
- Proof of payment attached?

Scientific Dossier

- Proposed label in duplicate?
- CoA for premix or constituents?
- SACNASP proof attached?
- Importer specific: Free Sale & Origin Compliance certs attached?

Operations

- QMS standard (GMP/ISO/FAMI-QS) proven?
- Reference sampling protocol (Shelf-life + 1 month) active?

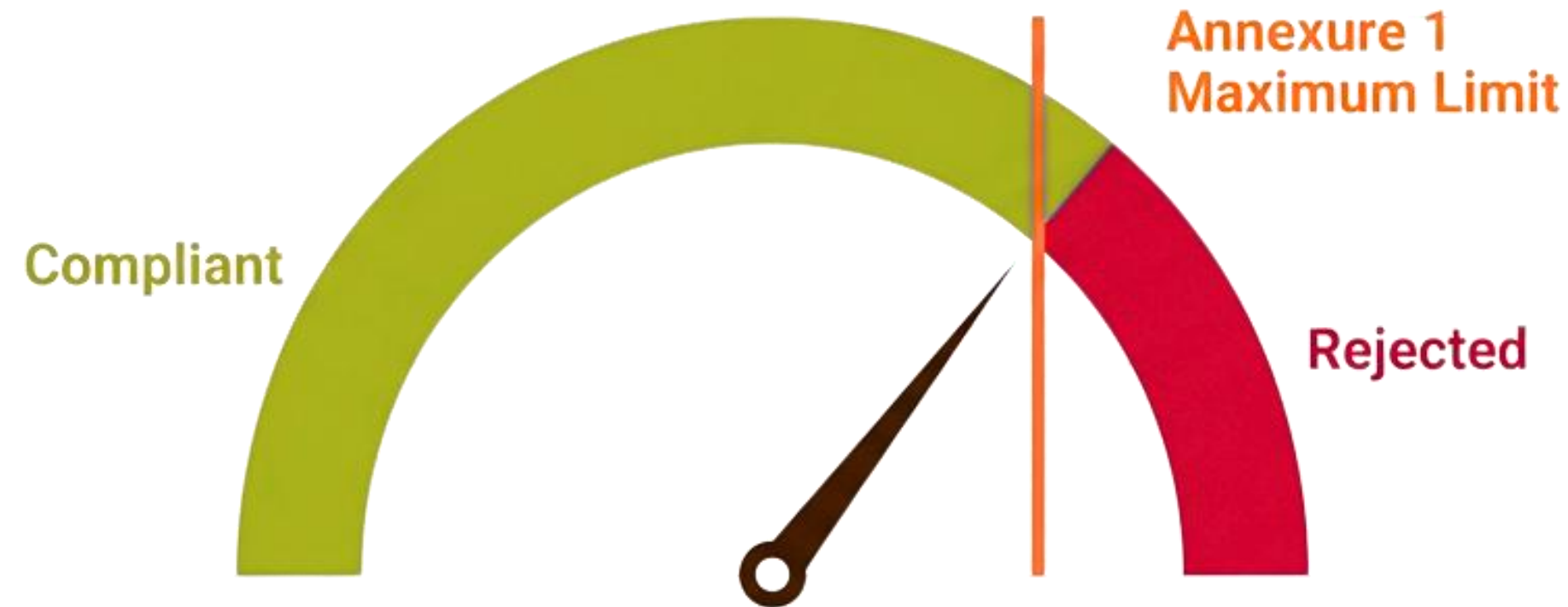


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Managing Undesirable Substances



The Baseline Reality

The detection of undesirable substances within a premixture formulation does not trigger an automatic regulatory disqualification.

The Compliance Threshold

A premixture containing undesirable substances may be legally registered only if the absolute contents of those substances do not exceed the strictly defined maximum tolerable limits quantified in Annexure 1 of the Farm Feed Regulations.

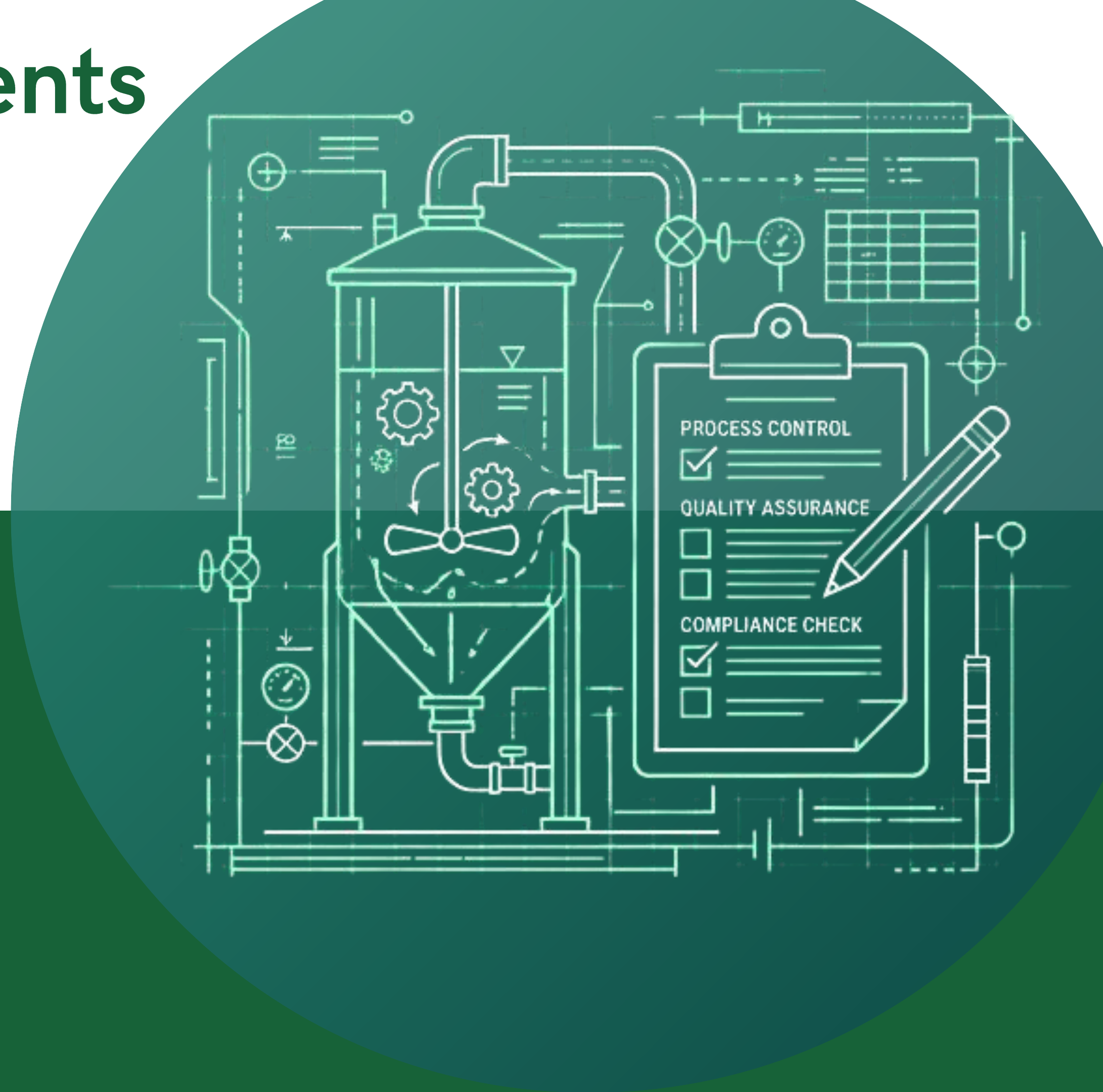


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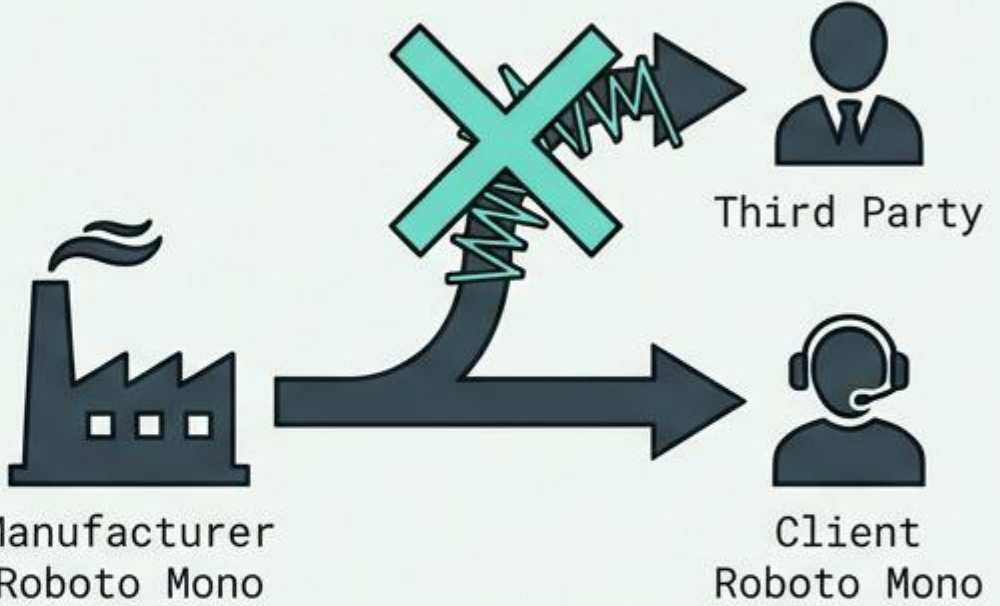
General Requirements for Custom Mixes



The twin constraints of custom mixes



100% Domestic Sourcing
A custom mix can only be sourced within the Republic of South Africa.
(Section 29.5)



100% Exclusive Fulfillment
A custom mix cannot be sold to anyone other than the specific person who ordered it.
Zero diversion permitted. (Section 29.4)



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The twin constraints of custom mixes



Exemption from Formal Registration

Custom mixes bypass the standard multi-month, dossier-heavy registration process required for commercial feeds.

This allows immediate response to specific client or end-user needs.



Stringent Internal Traceability

In exchange for speed, the manufacturer assumes total responsibility for localized traceability.

Every batch requires rigorous internal documentation, physical sample retention, and restricted labelling.

The regulator grants operational flexibility provided you guarantee verifiable safety.



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The Regulatory Exemption

1.4. REGISTRATION — The Registration is not required according to make section 1 of Act 36 of 1947.

EXEMPT FROM REGISTRATION

Registration is not required according to Section 1 of Act 36 of 1947.

Because the custom mix is created for a specific, verified client based on a direct, written request, it is legally shielded from the commercial Farm Feeds registration process.

The Custom Mix Operational Dashboard

Manufacturers must maintain an internal ledger for every custom mix containing these six pillars:



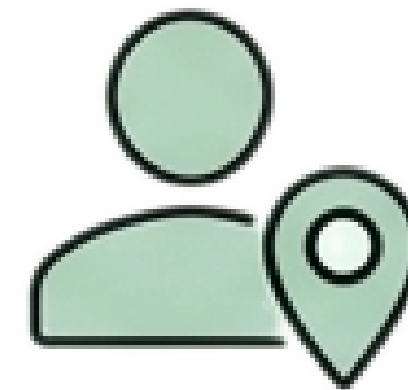
Results of quality checks on additives used

1



Records of sale (include customer and quantity sold)

2



Name and address of customer

3



Composition and mixing instructions, as well as the purpose for which it is needed.

4



The quantity mixed

5



The signature of and date on which the person submitted a written request.

6

Sample Retention: Custom Mixes

The Mandate (Section 28.3)

Under regulation 29(1), alongside written records, manufacturers are legally obligated to retain a physical sample of every manufactured premixture batch.

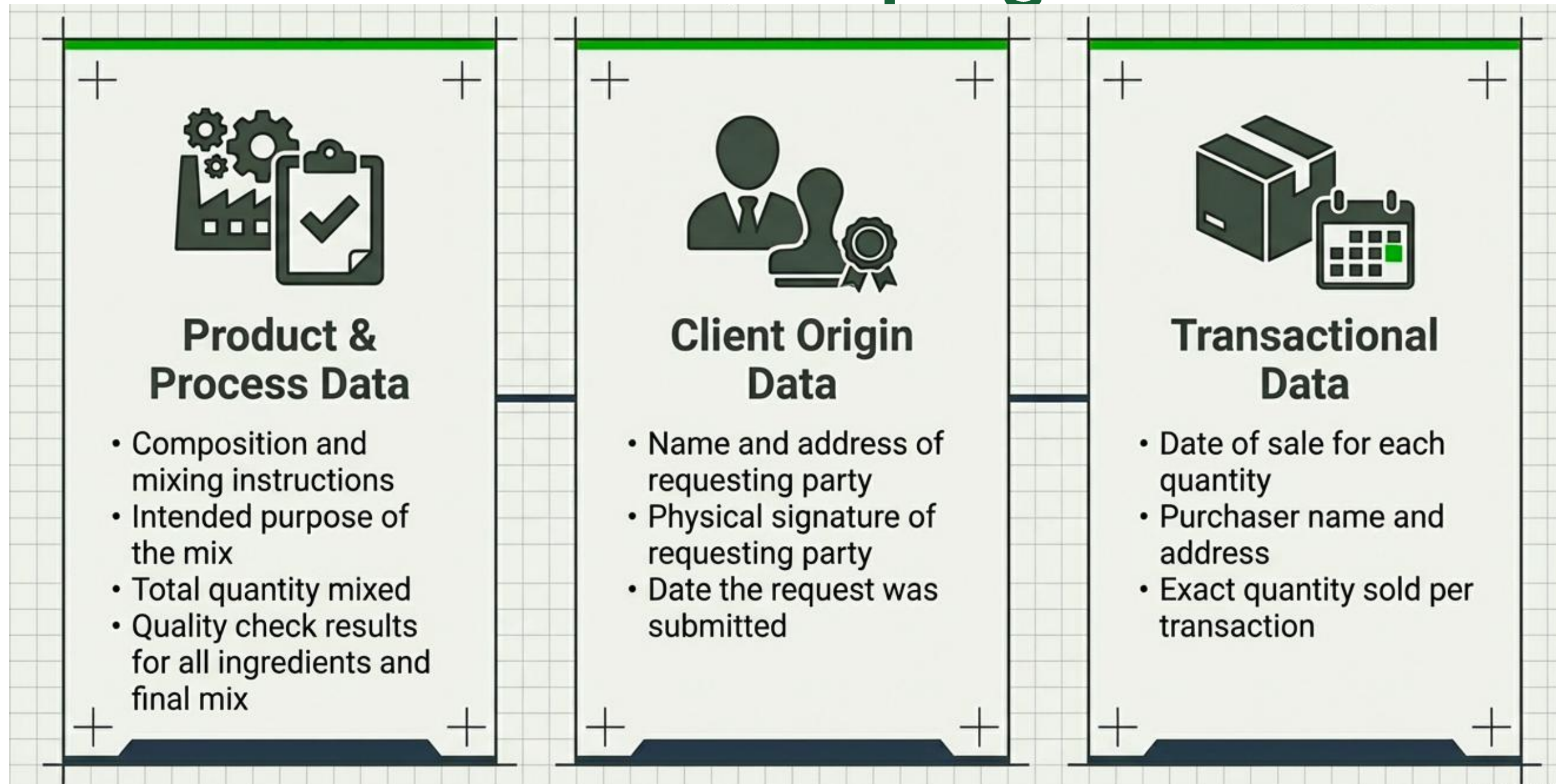
The Dispute Clause

If a regulatory, safety, or commercial dispute arises concerning the batch the standard timeline is voided. The sample must be retained until the dispute is officially resolved.



Standard Retention Timeline: The sample must be securely kept for the complete duration of the product's stated shelf life, **PLUS** one additional month.

The three domains of Comprehensive Record Keeping



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Anatomy of a Custom Mix Label

Name and address of the person who placed the order.

(Emphasize the buyer's name, not a retail brand name).

**NOT FOR
PUBLIC SALE**



Unlike registered feeds, custom mix cannot feature marketing claims, broad directions for use, or commercial branding meant for retail shelves.

It is restricted, close-looped transaction.

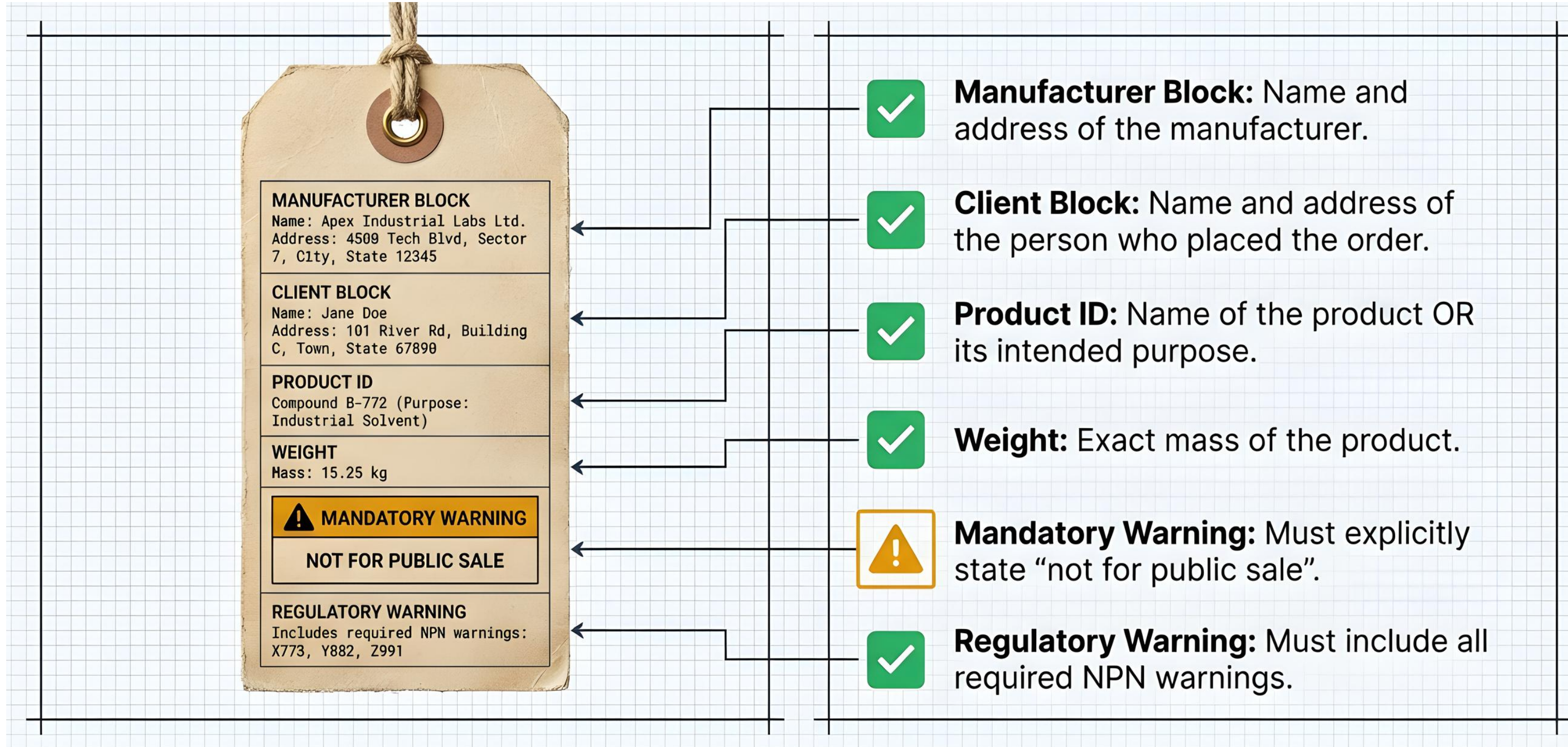


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Custom Mix Labelling Requirements



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Premixtures vs Custom Mixes

	Premixtures	Custom Mixes
Intended User & Purpose	● General feed manufacturers; intended to supply prescribed nutritional baselines.	● One specific client; formulated for a highly specific, bespoke purpose.
Legal Resale Status	✓ Commercially tradable within general agricultural markets.	⚠ Strictly prohibited from public sale or transfer to third parties.
Sourcing & Origins	● Can utilize imported products (with Free Sale Certificates and local law compliance).	● Can only be sourced within the Republic of South Africa.
Quality & Record Keeping	● Requires upfront proof of QMS (GMP, ISO) during the application phase.	● Requires exhaustive batch-by-batch records of ingredient quality, sale dates, and client signatures.
The Shared Mandate Both product types must strictly retain a reference sample for 'Shelf life + 1 month' (or indefinitely until any dispute is resolved).		



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