

ACT 36 FARM FEED REGISTRATION WORKSHOP

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Why Feed Matters

Feed is the **foundation of the food chain**

Impacts:

- Animal health
- Farm Productivity
- Food safety

“Safe feed = Safe food”

Act 36 regulatory Amendment

The Shift: The first major revision in two decades modernizes Act 36 to align with global feed safety, traceability, and nutrition standards.

Status: ACTIVE PHASE-IN

IMMEDIATE ACTION

Annexure 1 maximum limits for undesirable and restricted substances take effect immediately.

January 16, 2026
(Publication)

Regulations officially
gazetted.

Why were the Regulations updated

- Industry has evolved significantly
- Drivers:
 - Advanced nutrition science
 - New ingredients & technologies
 - Global alignment
 - Feed safety expectations

Previous regulations outdated (~20 years old)

Key Updates Overview

- Improved **definitions & terminology**
- Streamlined **registration processes**
- Improved **feed safety controls**
- Updated **feed classifications**
- Revised **labelling requirements**
- Updated **contaminant limits & carry-over controls**

Schedule - Definitions

● ● ● Impact level: **MODERATE** (interpretation + scope impact)

What's new / changed

Broader scope of regulated products

- “Additive” replaced by broader “**feed additive**” definition
- Now includes micro-organisms, nutraceuticals, herbal supplements
- Addition via feed **or water** explicitly covered

Introduction of registration lifecycle concepts

- Amendments, minor administrative amendments
- Parallel registration & daughter registration
- Certificate of registration formally defined

New safety & risk terminology embedded

- Restricted substance & undesirable substance
- Carry-over
- Withdrawal period
- HACCP
- GMO defined

Terminology modernised

- “Feedstuff” → “Ingredient”
- “Mixed animal feed” → “Compound feed”
- Alignment with SANAS / ILAC accreditation systems

What stayed the same

- Core concept of farm feed remains
- Registration requirement unchanged
- Safety, efficacy and quality principles retained
- Enforcement authority unchanged

Action / Advise

- Review product classifications under updated definitions
- Check additive and nutraceutical portfolios for regulatory inclusion
- Align internal terminology with new defined terms
- Monitor daughter / parallel registration dependencies
- Await updated Guidelines for operational clarification

Expanded scope of Feed Additives

- Now includes:
 - Microorganisms
 - Nutraceutical-type products
 - Herbal supplements
- Reflects modern animal nutrition practices

Registration Improvements

- Before: All changes = full amendment application
 - 👉 Delays + admin burden
- **Now:** Minor administrative amendments
 - Notification-based
 - Faster processing
 - Focus shifts to technical evaluations

Minor Administrative Amendments (Table 14)

- Examples:
 - Packaging artwork changes
 - Additional pack sizes
 - Removal of claims
 - Language changes
 - Contact detail updates
- 👉 Reduced regulatory burden

Parallel and Daughter Registrations

- **Parallel registration**
 - Same company
 - Same product, different name
 - **Daughter registration**
 - Different company
 - Requires consent
 - Linked to “mother” registration
- 👉 If mother lapses → daughter lapses

Professional Accountability

Nutritional adequacy declarations:

- **Animal scientist (SACNASP)** → Farm feeds
- **Veterinarian** → Complete and Complementary Pet Food
(with expertise)
- **Pharmacist** → Nutraceuticals and Supplementary
Pet food (with expertise)

Updated Farm Feed Classes

- Alignment with **latest NRC science**
- Updated:
 - Nutrient specifications
 - Guaranteed analyses
- New inclusion:
 - **Game feed (NEW)**

Feed Types and Categories (Table 2)

Updated classifications:

- Complete feeds
- Complementary feeds
- Supplementary feeds

Production stages:

- Starter
- Grower
- Finisher
- Maintenance

👉 Supports innovation without re-substantiation

Labelling Changes

- **Date marking now mandatory**
- **More flexibility in label layout**
- **Must still ensure:**
 - **Clarity**
 - **Compliance**
 - **Accuracy**

Advertising: A Major Shift

Before:

Pre-approval required

Now:

Post-market compliance

Must:

- Align with registered product label
- Remain in scope of the registration
- Avoid misleading or therapeutic claims
- Avoid unsubstantiated endorsements
- No unregistered products

👉 Faster market communication

Feed Safety Systems

Stronger requirements (Part I and Part VI):

- **HACCP-based systems** : Pet Food Products
- **Good manufacturing practices** : Livestock Feed

Facility suitability

👉 Shift to **preventative risk management**

Traceability and Recall

- Record retention: ≥ 5 years
- Must demonstrate:
 - **4-hour recall capability**
- Improved:
 - Traceability systems
 - Documentation

Reference Samples

Retention:

Shelf life + 1 month

Or until dispute resolved

👉 Supports **compliance & investigations**

Undesirable Substances (Annexure 1)

Updated limits:

- **Heavy metals**
- **Mycotoxins**
- **Dioxins**
- **Pesticides**

Alignment with EU standards

Carry-Over (New): Annexure 1 Section VII

First-time regulation in SA

Risk:

- Residual contamination between batches

Requirements:

- Verification of levels
- Must remain within limits

👉 Critical for premix/feed mills

Implementation Timeline

Public comments: **Closed Feb 2026**

Final regs: Pending publication

Implementation:

6-month transition period following final publication

Exception:

Controlled & Restricted substances (Regulation 19 & Annexure 1)

→ **Immediate effect**

Importance of Guidelines

Must align:

- Registration Guidelines
- Farm Feed Guidelines

Provide:

- Practical application
- Label guidance
- Nutritional requirements

What this means for the industry?

- More **flexibility & innovation**
- Reduced in regulatory burden
- Clearer regulatory framework
- Improved processing

What this means for Farmers

- Improved:
 - Product labelling
 - Feed safety
 - Confidence in products