

THE DAIRY STANDARD AGENCY

PROMOTING DAIRY QUALITY AND SAFETY



Update on review of R1510: Modified & Imitation products

2022 SASDT Symposium



Milk South Africa
Melk Suid-Afrika



Why Standards & Regulations for Dairy products?

International commerce



Protect local
dairy market
integrity &
high standards

Product names
& definitions & composition

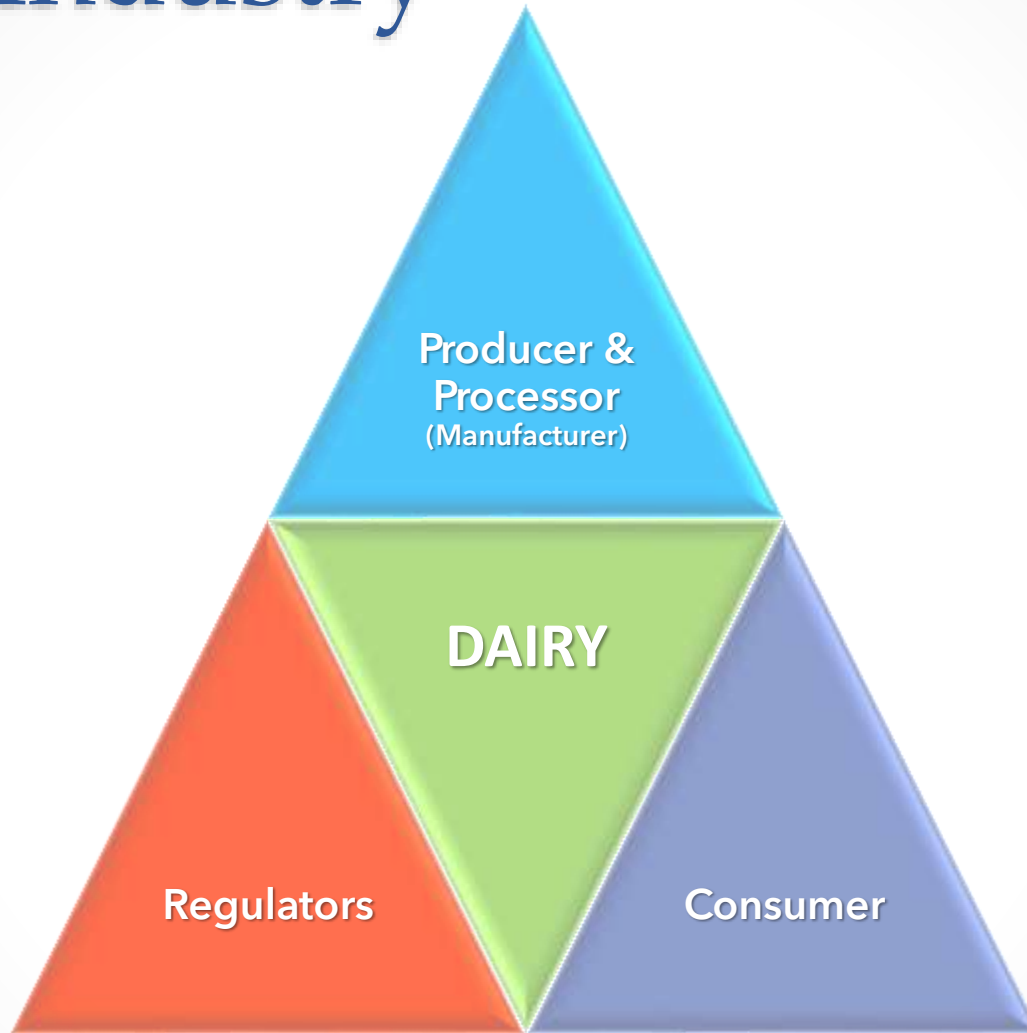
Consumer understanding
and trust

Level playing field

Platform of agreement



Dairy Industry



Review process



First meeting: March 2021



Meetings coordinated by Milk SA Regulations and Standards Project of Milk SA TWG



Technical Work Group with full transparency
Emphasis on technical proposals without decision powers



Industry dispensations
Consumer queries
Simple & easy to implement & regulate



Status of R1510 review

- Naming of **Modified & Imitation dairy products**
 - 3 groups: Primary dairy, Modified dairy, Dairy free.
 - Naming proposals with amendments to Table on Modified products
- Remove compositional requirements for **Dairy free products**
 - Propose naming requirements
- Propose requirements for the use of **dairy terms**, as per Codex
- Proposals regarding **Dairy desserts, Dairy Snacks and Custard**
- Table 10 - **Unspecified Cheese** have been aligned to Codex
- **Cheese Additions to the Class designation** aligned to Codex
- **Butter with whey cream** as an ingredient
- Standards & regulations for **Goat's milk & milk products**



...during R1510 review

Naming of **Modified & Imitation** dairy products



“Our approach must focus on option 1 only for the reasons listed below:

- the words “imitation” and “modified” was perceived as negative to the consumer.
- There is little consumer education: what part/portion of the product is ‘modified’ or ‘imitated’.
- It could indicate that something ‘fake’ was done to the product. Something artificial.
- NB: correct & appropriate product description in the name

It was agreed that if the product name is adequately informing the consumer and not misleading the consumer, their purchase decision remains their responsibility and decision.”

...during R1510 review

Naming of **Modified & Imitation** dairy products

"**modified dairy product**" means a product that, in so far as it relates to general appearance, presentation and intended use, corresponds to a primary dairy product, and of which any amount of the fat content [and/or](#) protein content and/or carbohydrate content has respectively been obtained from a source other than a primary dairy product; synonym: imitation dairy product.



...during R1510 review



Naming of **Modified & Imitation** dairy products

Remove compositional requirements for **Dairy free products**, but state **requirements for dairy terms** and add **main panel statement** to inform the customer that the product is not a dairy product.

2 proposals to consider for the main panel requirements of non-dairy products – for comment by the industry.



Next steps

Draft proposal to Dairy industry for comment: **end March 2022**

LAST DAY FOR COMMENTS to work group: **29 April 2022**

Industry comments consolidation into Draft Amendments to R1510

Final alignment with Technical work group: **May 2022**

Final Draft Proposal of Amendments to R1510



handed over to DALRRD for consideration and finalisation

Circulate to Dairy industry for **formal comments process**

Publish revised Dairy regulation with implementation period





Thank you for your contribution
in the review of the dairy
regulatory landscape in the
interest of the industry and the
consumer

