



Donau Soja Standard

The Donau Soja programme has been established to promote and propagate the cultivation, processing and marketing of GM-free, origin-controlled and sustainable **quality soya from the Danube Region**. Our vision is to develop and guarantee a sustainable, safe and European protein supply.

Donau Soja is a product of controlled origin and quality. Historically, it has two essential characteristics: The soya originates from the Danube Region (**European origin**), and the soya beans and their products are **GM-free**. Food produced from or using Donau Soja soya beans may be labelled as "Donau Soja" or "Fed with Donau Soja". Use of the **registered brand** is subject to signing a Licence Contract as well as to compliance with the Donau Soja and Europe Soya Agreement for Logo Use.¹

Partners located in both **EU and non-EU member states** shall comply with the current **legal provisions of EU law**², particularly those concerning Good Agricultural Practices, the use of pesticides in soya bean cultivation and the processing of raw soya beans along the processing chain. Furthermore, both EU-wide and international regulations on labour and social rights² (ILO Conventions) shall apply. Farmers producing Donau Soja soya beans (hereinafter referred to as "Donau Soja soya bean farmers") shall undertake in writing to comply with all Donau Soja requirements (**Sustainability Declaration**³).

Donau Soja certified produce automatically meet the criteria required for Europe Soya certification (see website www.donausoja.org for the Europe Soya Standard and criteria).

The Donau Soja Standard is based on the following ten **Donau Soja principles of soya bean cultivation**. These principles cover Donau Soja's two essential characteristics of "European origin" and "GM-free status", plus **additional social, environmental and economic aspects**.

- 1 European origin of soya beans and soya bean products
- 2 GM-free status of soya beans and soya bean products
- 3 Responsible farm management and community relations
- 4 Use of best practices in soil and nutrient management
- 5 Use of best practices in crop protection
- 6 Use of best practices in water management
- 7 Use of best practices in waste management
- 8 Responsible land use and biodiversity protection
- 9 Reduction of greenhouse gas emissions
- 10 Compliance with human and labour rights and safe working conditions

All relevant provisions of the Donau Soja Standard, like those referring to Good Agricultural Practices, environmental and biodiversity protection as well labour and social rights, are based on EU legislation.² However, the requirements of the Donau Soja Standard exceed the legal acts passed by the EU in several aspects.⁴

¹ Donau Soja and Europe Soya Agreement for Logo Use: <http://www.donausoja.org/en/downloads>

² For details, see Annex C: *Applicable Legislation and International Conventions*

³ For details, see document *Declaration of Self-Commitment – Farmers*

⁴ For details, see Annex A: *Donau Soja Principles of Soya Bean Cultivation*

Overview of Donau Soja principles of soya bean cultivation

The following section provides a brief overview of the Donau Soja principles of soya bean cultivation.

- **European origin of soya beans and soya bean products (Principle 1)**

The countries and regions of origin of Donau Soja soya beans are defined in both political and geographical terms. Enumeration of the countries in which Donau Soja can be produced is based on the list of countries in the Danube river basin⁵.

The geographical definition of potential cultivation areas in each country is based on consumer expectations related to the term Donau Soja on the one hand, and on the feasibility of monitoring the origin of products on a region-by-region basis on the other hand. The countries and geographical regions detailed on the Donau Soja Map (= Donau Soja cultivation areas) are a permanent feature of the Donau Soja Standard.



Donau Soja Map: Geographical map showing the Donau Soja cultivation areas

The Donau Soja region consists of the following European countries: Austria, Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Germany (Bavaria and Baden-Württemberg only), Hungary, Italy (Trentino Alto Adige, Friuli Venezia Giulia, Veneto, Emilia-Romagna, Lombardia, Piemonte and Vallée d'Aoste only), Moldova, Poland (Dolnoslaskie, Opolskie, Slaskie, Swietokrzyskie, Podkarpackie and Malopolske only), Romania, Serbia, Slovakia, Slovenia, Switzerland, Ukraine (Uschgorod, Tschernowzy, Winniza, Odessa, Lwow, Ternopol, Chmelniczki and Iwano-Frankovsk only).

⁵ International Commission for the Protection of the Danube River: www.icpdr.org/main/danube-basin/countries-danube-river-basin



- **GM-free status of soya beans and soya bean products (Principle 2)**

Donau Soja soya beans and soya bean products come from GM-free cultivation using GM-free soya bean varieties either listed in the EU common catalogue of plant varieties or in the respective national catalogue of plant varieties. Donau Soja soya bean farmers are not allowed to grow GM soya beans or any other GM crop. Animal feed with the quality label "Donau Soja" are suitable as feed for livestock, whose products may subsequently be marketed with the quality label "Ohne Gentechnik hergestellt" / "Produced without GMOs".

The GM-free status shall be based on the minimum requirements set out by the following European "GM-free" certification schemes:

- German *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*⁶, with audits performed as stipulated by the German Verband Lebensmittel ohne Gentechnik (VLOG);
- Austrian Food Codex (Codex Alimentarius Austriacus) and the corresponding *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production);⁷
- Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard.⁸

Apart from the possibility of obtaining a non-GM certification in accordance with the Austrian Food Codex, German VLOG or Non-GM Danube Region Standards, the GM-free status can also be verified during Donau Soja audits and certifications by checks conducted in compliance with the Non-GM Danube Region Standards⁶, both published in 2015.

- **Responsible farm management and community relations (Principle 3)**

Donau Soja soya bean farmers shall comply with all applicable legislation. All forms of bribery, conflicts of business interest and fraudulent practices shall be prohibited. Existing land rights shall be respected. Negative impacts on the wider community shall be avoided and communication channels shall be in place.

- **Environmental responsibility and Good Agricultural Practices (Principles 4–7)**

The relevant legal provisions of EU law shall apply. Donau Soja soya bean farmers shall apply best practices in soil, water and waste management to protect soil, water and air. Only pesticides containing EU-approved active ingredients may be used for the cultivation of Donau Soja soya beans—this also applies to farmers located outside the EU. Furthermore, substances listed in the

⁶ *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html

⁷ *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of GMO-Free Production of Food and its Labelling) in the Austrian Food Codex, IV edition: www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn

Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit (Guideline on the Risk-Based Monitoring of GMO-Free Production): www.bmwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf

⁸ Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard: <http://www.donausoja.org/en/downloads>



Stockholm and Rotterdam Conventions⁹ as well as all substances the World Health Organization (WHO) has categorised as extremely hazardous (Class 1a) and highly hazardous (Class 1b)¹⁰ shall be prohibited. Lastly, the use of desiccants prior to harvest (e.g. glyphosate and diquat) as well as aerial application of pesticides (aerial spraying) shall be prohibited. The Best Practice Manual, published and continuously updated by the Donau Soja Organisation, shall serve as a non-binding recommendation for both improving the profitability of soya bean production and reducing the use of plant protection products.

- **Responsible land use and biodiversity protection (Principle 8)**

Deforestation and conversion of natural ecosystems (including but not limited to wetlands, peatlands and grasslands) for the cultivation of Donau Soja soya beans shall be prohibited. The farmer shall only use cropland that was dedicated to agricultural use no later than 1 January 2008, hence excluding any further agricultural expansion for the cultivation of Donau Soja soya beans. Donau Soja soya beans shall not be cultivated in protected areas unless the use of such areas for agricultural purposes is explicitly allowed in the respective management plan.

- **Reduction of greenhouse gas emissions (Principle 9)**

Donau Soja soya bean production shall contribute to reducing greenhouse gas emissions and climate protection. Donau Soja soya bean farmers shall have knowledge of how to reduce greenhouse gas emissions and increase the sequestration of greenhouse gases on the farm. Relevant inputs, such as seed inputs, fertiliser application, pesticide application and fuel use, shall be recorded and monitored. The farmer shall develop a plan to minimise greenhouse gas emissions.

- **Compliance with human and labour rights and safe working conditions (Principle 10)**

Donau Soja soya bean production shall comply with both EU-wide and international labour and social standards (see Annex C for a list of relevant conventions of the International Labour Organization [ILO]¹¹). These include the following fundamental principles and labour rights: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; the elimination of discrimination with respect to employment and occupation. Also included are: transparent and legally compliant employment conditions, safe working conditions and training of workers.

⁹ Stockholm Convention on Persistent Organic Pollutants: www.pops.int/Portals/0/download.aspx?d=UNEP-POPS-COP-CONVTEXT-2017.English.pdf

Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade: www.pic.int/Portals/5/download.aspx?d=UNEP-FAO-RC-CONVTEXT-2017.English.pdf

¹⁰ World Health Organisation (WHO) Classification of Pesticides by Hazard: https://www.who.int/ipcs/publications/pesticides_hazard/en/

¹¹ Introduction to the standards-related work of the International Labour Organization: https://www.ilo.org/global/standards/information-resources-and-publications/publications/WCMS_672549/lang--en/index.htm



Inspections:

Compliance with the Donau Soja Standard shall be verified against the detailed requirements specified in the Donau Soja Guidelines by an independent external certification body accredited in accordance with the ISO/IEC 17065:2012 standard. Furthermore, the Donau Soja Organisation shall commission risk-based integrity audits.

If there is reason to suspect that any provision has not been complied with, special audits shall be conducted. Any breach of the Donau Soja Guidelines shall result in remedial measures, including the payment of penalty fees, up to and including exclusion from the Donau Soja programme.



Core Principles of Inspection (Overview)

Donau Soja is a product of controlled quality and origin. The requirements specified in the Donau Soja Guidelines provide the details for complete inspection of the produce's origin (Principle 1), ensuring a GM-free status throughout the entire value chain (Principle 2) and implementing all other sustainability criteria (Principles 3–10).

As a rule, the relevant legal provisions of EU law shall apply for the production, treatment and processing of Donau Soja. The GM-free status shall be based on the minimum requirements set out by the following European "GM-free" certification schemes:

- German *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*¹², with audits performed as stipulated by the German Verband Lebensmittel ohne Gentechnik (VLOG);
- Austrian Food Codex (Codex Alimentarius Austriacus) and the corresponding *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production);¹³
- Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard.¹⁴

Other certification schemes assessing compliance with the criterion of ensuring GM-free status may be recognised by the Donau Soja Organisation as being equivalent to the above-mentioned certification schemes. In any case, Donau Soja products and Donau Soja animal feed shall be of such a quality that it can be labelled as non-GM food or feed or is suitable for use in non-GM food production.

For reasons of general quality assurance, all oil mills and compound feed producers shall be obliged to participate in a QA programme recognised by the Donau Soja Organisation. A list of recognised programmes and standards can be found in the requirements specified in R 04 (Soya Bean Primary Processor) and R 05 (Compound Feed Producer).

The Donau Soja inspection system is comprised of three stages:

- quality assurance and self-monitoring systems operated by the participants in the Donau Soja system themselves;
- external audits and certifications commissioned by the licensees; these shall be conducted by ISO/IEC 17065:2012-accredited certification bodies approved by the Donau Soja Organisation;

¹² *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: www.gesetze-im-internet.de/eggentdurchfG/BJNR124410004.html

¹³ *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of GMO-Free Production of Food and its Labelling) in the Austrian Food Codex, IV edition: www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn

Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit (Guideline on the Risk-Based Monitoring of GMO-Free Production): www.bmfwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf

¹⁴ Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard: <http://www.donausoja.org/en/downloads>



- integrity audits conducted in collaboration with a certification body or auditors, and directly commissioned by the Donau Soja Organisation; integrity audits shall be risk-based; in the order of 10 % of the licensed quantity of Donau Soja soya.

Donau Soja certification shall apply to the following levels of operation throughout the entire food and feed value chain:

- Soya Bean Farmer (Producer)
- Agricultural Soya Bean Collector and Primary Collector
- Soya Trader
- Soya Bean Primary Processor
- Compound Feed Producer
- Agricultural Processor
- Food Processor through Marketer

To guarantee comprehensive monitoring, all participants in the Donau Soja programme shall be subject to audits. **Confirmation of compliance** with the Donau Soja Guidelines resulting from external audits shall be passed on within the value chain in the form of a **certificate**. In case of certified unprocessed soya beans, lot-based certificates (**lot certificates**) shall additionally be issued by the agricultural collector to the primary processor. In case of certified processed soya produce, **certificates of traceability** may additionally be issued by the primary processor to the marketer. All participants in the Donau Soja system may be audited at any time, and on a risk basis, in the form of risk-based sampling in integrity audits.

Donau Soja soya bean farmers shall be registered with the agricultural collector. During this registration, farmers shall undertake to comply with the Donau Soja Guidelines on behalf of their agricultural holdings by signing the **Sustainability Declaration**, and shall accept risk-based sampling within the scope of integrity audits commissioned by the Donau Soja Organisation. The subject of any audit shall be the farm where Donau Soja soya beans are cultivated. The audit scope shall be limited and defined by the boundaries of the farm. It may include fields where soya beans are cultivated, but may also include any non-soya growing areas, non-cultivated areas, infrastructure, and facilities as well as other areas that form part of the farm.

Primary processors (such as oil mills, toasters, food producers and producers of food ingredients and food additives), processing and/or treating soya beans chemically or physically most substantially, shall conclude a contract with the Donau Soja Organisation in which they pledge, among other things, to:

1. know and comply with the Donau Soja Guidelines;
2. conclude, at their own expense, a certification contract with an external ISO/IEC 17065:2012-accredited certification body approved by the Donau Soja Organisation;
3. accept risk-based sampling in integrity audits directly commissioned and paid by the Donau Soja Organisation;
4. pay a Donau Soja fee to the Donau Soja Organisation (the fee shall only be charged once within a continuous processing chain, namely at the primary processor stage);
5. impose bullets 1 to 3 on all their suppliers (including their suppliers' suppliers upstream) by contract, up to and including the agricultural collector.



This ensures that all participants in the Donau Soja system are aware of the Donau Soja Guidelines, have compliance with these Guidelines verified externally by certification bodies that are approved by the Donau Soja Organisation, and agree to integrity audits.

Compound feed producers shall also conclude a contract with the Donau Soja Organisation in which they undertake to comply with the above-mentioned bullets 1 to 3.

Marketers intending to place products with the Donau Soja logo on the market shall undertake not only to comply with the above-mentioned bullets 1 to 3, but also to impose the obligation to comply with the Donau Soja Guidelines—and also with the audit requirements—on their suppliers and their suppliers' suppliers upstream by contract.

Donau Soja audit frequencies shall be risk-based:

The frequencies of external audits as well as additional requirements for certain participants in the Donau Soja system shall be based on the risk of (a) a different origin of the produce or (b) contamination of Donau Soja soya beans with GM crops.

The countries where Donau Soja may originate from shall be classified at the following four risk levels (RL):

- Risk Level 0 (RL 0):
EU countries: national bans on the cultivation of all GM crops approved for cultivation in the EU (currently GM maize),
non-EU countries: no GM varieties approved for cultivation;
- Risk Level 1 (RL 1):
risk is related to geographical origin; (countries represented with regions: DEU, ITA, POL);
- Risk Level 2 (RL 2):
risk of GM contamination with other crops (e.g. maize); concerns countries such as CZE, ROU, SVK—where the cultivation of GM maize is not prohibited and contamination may therefore occur;
- Risk Level 3 (RL 3):
risk of contamination with GM soya because GM soya beans are cultivated in this country or were cultivated there up until two years ago, or because the situation is unclear (e.g. MDA, UKR).

Precise requirements and obligations for the different risk levels (RL) at the stage of farmers, traders, agricultural collectors, primary processors, compound feed producers, agricultural processors and marketers, as well as binding audit frequencies shall be specified in the requirements for all participants in the Donau Soja system.

The selection of participants in the Donau Soja system that are subject to integrity audits shall be based on the following six risk categories: (a) a different origin of the produce; (b) contamination of Donau Soja soya beans with GM crops; (c) use of non-approved plant protection products; (d) application of desiccants; (e) legal non-compliance; (f) land conversion and soya bean cultivation in protected areas.¹⁵

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¹⁵ For details, see Annex D: *Risk Categories for Integrity Audits*



Donau Soja Audit Frequency

	Risk Level 0 Donau Soja soya only	Risk Level 1 risk of origin	Risk Level 2 GM risk for crops other than soya	Risk Level 3 GM risk for soya
F	no GM cultivation in this country	<i>not relevant</i>	cultivation of other GM crops (e.g. maize) permitted	cultivation of GM soya beans in this country
C	no (1)	no (1)	no (1)	yes; additional: registration of F + original seeds
F				once a year
AC	stores only DS	stores only GM-free crops, but soya beans of different origins (non-GM) are possible	stores only GM-free soya beans, but other GM crops (e.g. maize) are possible	stores other GM crops, but GM soya beans (soya bean meal) are also possible
C	yes	yes	yes	yes
F	every 2 years	every 2 years	every 2 years (Romania: once a year)	once a year
T	soya trade with DS only	soya trade with GM-free soya only	<i>not relevant</i>	both GM and non-GM soya trade
C	yes	yes		yes
F	every 2 years	every 2 years		once a year
PP	only DS processed	other GM-free soya beans processed as well	other GM crops processed as well	GM soya beans processed as well
C	yes	yes	yes	yes
F	once a year	once a year	twice a year (once unannounced)	twice a year (once unannounced)
CFP				
C	yes	yes	yes	yes
F	according to non-GM audits (2)	according to non-GM audits (2)	according to non-GM audits (2)	according to non-GM audits (2)
AP	DS soya single or compound feed only	also other non-GM soya single or compound feed	also GM single or compound feed (but only in another farm activity)	also GM single or compound feed in the same facilities
C	yes	yes	yes	yes
F	every 2 years	every 2 years	every 2 years	once a year
FP				
C	yes	yes	yes	yes
F	according to non-GM audits (2)	according to non-GM audits (2)	according to non-GM audits (2)	according to non-GM audits (2)

(1) ACs are required to check the plausibility of the details given by Fs. Fs with registration obligation at risk level 3 need to be audited externally once a year.

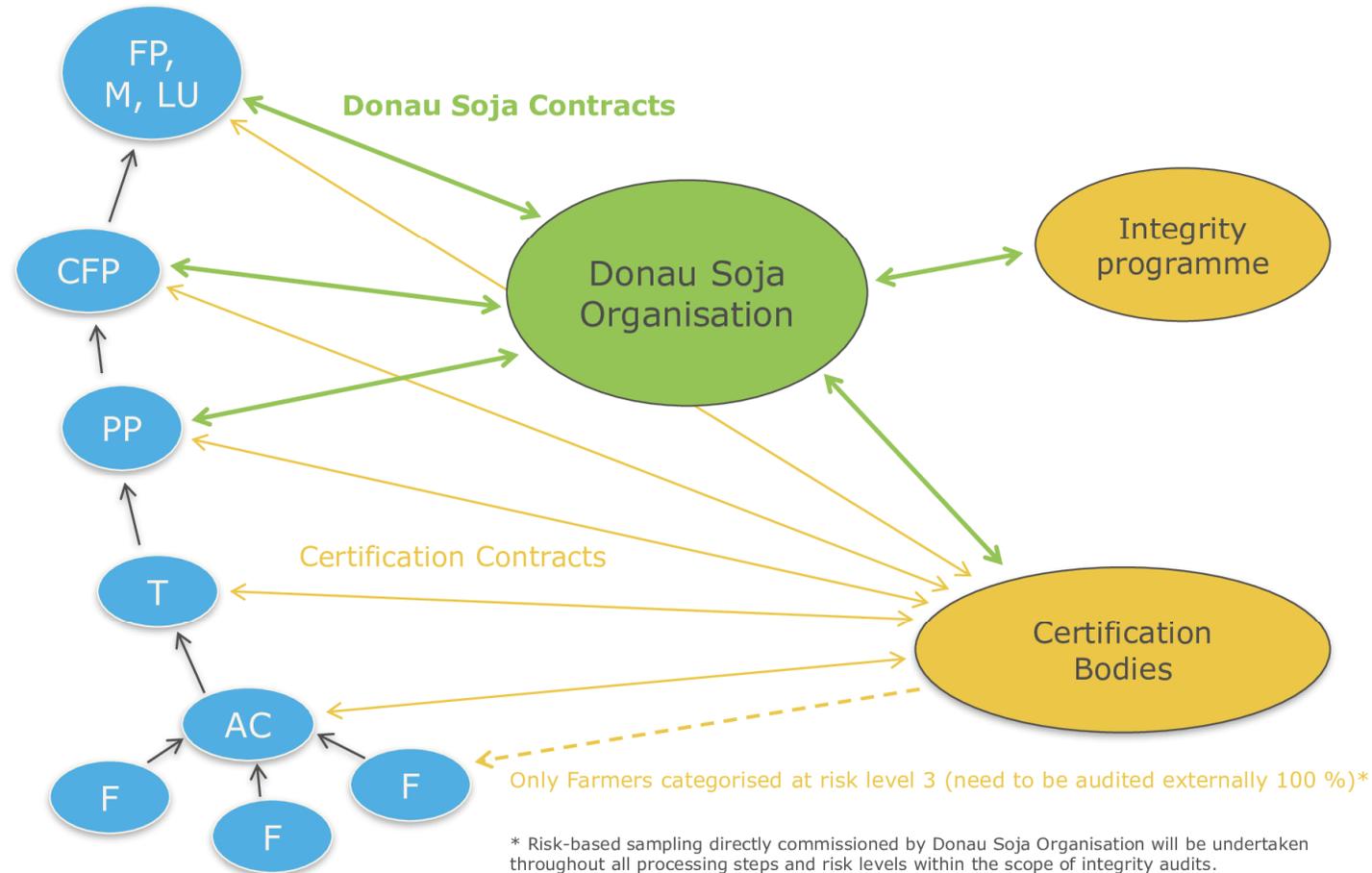
(2) Whenever possible, Donau Soja audits shall always be conducted together and in combination with non-GM audits.
If this is not possible, the Donau Soja audit shall be conducted at least once a year.

DS = Donau Soja; **F** = Farmer, **AC** = Agricultural Collector, **T** = Trader, **PP** = Primary Processor, **CFP** = Compound Feed Producer, **AP** = Agricultural Processor, **FP** = Food Processor
C = Certification, **F** = Frequency; **non-GM** = non-genetically modified, **GM** = genetically modified

Risk-based sampling directly commissioned by Donau Soja Organisation will be undertaken throughout all processing steps and risk levels within the scope of integrity audits.



Donau Soja Contract System



F = Farmer, AC = Agricultural Collector, T = Trader, PP = Primary Processor, CFP = Compound Feed Producer, FP = Food Processor, M = Marketer, LU = Logo User

Please note: exemplary flow of Donau Soja value chain