



REQUIREMENTS 05, Version 04

Compound Feed Producer

Purpose	Specify the Europe Soya requirements to be met by compound feed producers.
Definition	Compound feed producer: company producing ready-made feed material or complementary feed material by mixing single feed materials Non-GM (produce): non-genetically modified (produced without GMOs) GM (produce): genetically modified (produced with GMOs)
Outline	<p>1 Donau Soja definition of compound feed producer 1</p> <p>2 Incoming produce 1</p> <p>3 Animal feed formulation 2</p> <p>4 Processing, storage and packing 2</p> <p>5 Documentation and record keeping 3</p> <p>6 Outgoing produce, product labelling 4</p> <p>7 Quantitative flow monitoring 4</p> <p>8 PCR testing 4</p> <p>9 General quality assurance 5</p> <p>10 Europe Soya contract compound feed producer 5</p> <p>11 Directly commissioned inspections 6</p> <p>12 Supervisory inspections 6</p>
Status	Version 04: released by the Board on 29 April 2019

1 Donau Soja definition of compound feed producer

- 1.1 According to the definition by Donau Soja Organisation, compound feed producers are no primary processors because, as a rule, these producers do not use unprocessed soya beans. Compound feed producers are therefore downstream of primary processing.
- 1.2 If one site contains both a compound feed plant and a toasting plant, the processing line of toasting, along with all its plant sections, shall come under the requirements for primary processors (see Requirements R 04).

2 Incoming produce

- 2.1 The origin, type and quantity of the agricultural raw materials and inputs purchased and used shall be documented by keeping records (delivery notes, invoices), and disclosed to the certification body upon request. The critical species/plants used at the factory shall be documented, critical plants being those species where GM cultivation is practised all over the world (such as particularly soya beans, maize and rapeseed).
- 2.2 For critical raw materials from outside the EU, hard IP documentation shall be available. This particularly means:
 - detailed information about suppliers, the quantity and the product name shall be available;



- the origin of the produce shall be verified with certificates that guarantee traceability for the certification body and are based on analytical results;
- delivery notes/invoices shall not include a GM declaration.

2.3 For critical raw materials from within the EU, the following documentation is available:

- detailed information about suppliers, the quantity and the product name (Europe Soya where applicable);
- supplier contracts and framework agreements shall not suggest that the raw material is a GM product, and shall include the Europe Soya requirements;
- delivery notes/invoices shall not include a GM declaration;
- the origin of the produce is traceable for the certification body.

3 Animal feed formulation

3.1 In animal feed which bears a mark stating "geeignet zur Herstellung gentechnikfreier Lebensmittel mit Europe Soya Auslobung"/"suitable for the production of GM-free food labelled as Europe Soya" or which is labelled as "Europe Soya", the total amount of soya has to be Europe Soya soya (incl. soya components such as oil added to the animal feed).

Exemption: If the availability of individual soya components such as soya lecithin in sufficient quality cannot be ensured by at least two independent providers, other components certified as GM-free may be used on application and with the written consent of the Donau Soja Board.

3.2 Animal feed formulations and/or lot records shall be disclosed to the certification body for quantitative flow calculation.

4 Processing, storage and packing

4.1 The certification body shall have access to and power of audit in all relevant areas of the compound feed plant.

4.2 Acceptance, storage as well as internal transportation of non-GM produce shall be segregated from other/GM produce in either space or time.

4.3 Use of equipment for processing non-GM produce shall be segregated from other/GM produce in either space or time.

4.4 Standard operating procedures for spatial or chronological segregation of the flows of produce shall be available on site, and compliance with these procedures shall be documented on site.

4.5 All staff in the areas of incoming produce, storage, processing, packing, transportation, and outgoing produce have been trained in complying with relevant standard operating procedures.

4.6 The compound feed producer shall conduct a risk analysis indicating the critical points (= control points) with respect to possible GM contamination and GM carry-over. Afterwards, the company's certification body shall check the analysis document.



- 4.7 In case of dual plants (= chronological segregation between non-GM and other/GM produce): A carry-over analysis shall be conducted and documented.

5 Documentation and record keeping

- 5.1 A description of the company as well as a site plan of the plant, an organisational chart and a product flow diagram shall be available and open for inspection.
- 5.2 A list of the raw materials and suppliers as well as a list of the product catalogue and customers shall be available and open for inspection.
- 5.3 Not only incoming and outgoing produce, but also stocks and produce entering or leaving storage premises shall be quantified and recorded.
- 5.4 Standard operating procedures and documentation shall be available for the following areas:
- separate acceptance and storage in the incoming produce department;
 - separate processing of produce;
 - measures to prevent contamination and carry-over in all areas (blenders, conveyor belts, storage depots, transport vehicles, etc.);
 - separate flow of produce in the outgoing produce department, packing;
 - charts showing the transport routes and means of transport from the factory to the customer, plus measures to prevent contamination and carry-over in this area.
- 5.5 A documentation of staff trainings for compliance with the above mentioned standard operating procedures shall be available.
- 5.6 A complete list of customers, indicating which customers have received which lots of animal feed/raw materials shall, be available and open for inspection by the certification body at any time.
- 5.7 Lot-based traceability shall be possible at any time by virtue of the company's records.
- A sample "as shipped" shall be kept for each production lot in the compound feed plant at least until the specified expiry date.
- 5.8 Routine PCR sampling in the outgoing produce department (sampling plan) shall be incorporated into the compound feed producer's QM system, and include, at the least, the following information:
- responsible staff member(s) in the compound feed plant;
 - standard operating procedure(s) for representative sampling;
 - number of quarterly composite samples depending on the size and quantity of the produced animal feed lots in the outgoing produce department;
 - preparation and storage of the retained sample of each lot;
 - name of the laboratory commissioned.
- 5.9 A plan for sampling incoming critical raw materials for PCR testing shall be available.
- 5.10 A risk-based plan for sampling non-critical raw materials for PCR testing shall be available.



5.11 All available PCR test results shall be documented and open for inspection.

6 Outgoing produce, product labelling

- 6.1 The type and quantity of animal feed as well as their buyers shall be precisely documented in the outgoing produce department.
- 6.2 The produce itself (packaging) as well as outgoing invoices and delivery notes shall bear a mark stating "geeignet zur Herstellung gentechnikfreier Lebensmittel mit Europe Soya Auslobung"/"suitable for the production of GM-free food labelled as Europe Soya", such mark pointing out that the relevant animal feed is suitable for the production of animal products labelled as "fed with Europe Soya".
- 6.3 Single feed material (packaging) may be labelled as "Europe Soya" if this produce is entirely (100%) made up of Europe Soya soya or a processed Europe Soya soya product such as soya bean meal.
- 6.4 Compound feed (packaging) containing soya or a processed soya product such as soya bean meal may also be labelled as "Europe Soya" if 100% of the soya components is Europe Soya soya and all other compound feed components comply with the non-GM requirements.

7 Quantitative flow monitoring

- 7.1 Quantitative flow shall be monitored based on actual incoming produce and produce leaving for sale or production use. The certification body shall be entitled to request and inspect individual delivery notes and invoices. The quantities shall match with due regard to the formulations used and the lot records.
- 7.2 Not just the quantitative flow of non-GM produce, but the quantitative flow of Europe Soya as well shall be checked. These checks shall be performed as specified in paragraph 7.1. The quantities shall match with due regard to the formulations used.

8 PCR testing

- 8.1 PCR tests shall be performed in laboratories accredited in accordance with ISO standard 17025.
- 8.2 All available PCR test results shall be documented and open for inspection.
- 8.3 The results of PCR testing in accordance with the plant-specific sampling plan (see paragraph 5.8) for quarterly PCR tests shall be available.
- 8.4 The results of testing of incoming produce samples shall be available (see paragraph 5.9).
- 8.5 The results of testing of risk-based samples of non-critical raw materials shall be available (see paragraph 5.10).
- 8.6 If the PCR test detects the presence of GM content:
The contracted certification body shall be informed of the result, and the appropriate measures shall be taken depending on the GM content (lot identification, root cause analysis, marketing ban where applicable, etc.).



Comments on the marketing ban procedure in case of violations of GM thresholds:

In case of agricultural holdings and processors, composite samples shall be pooled.

If the PCR test result is less than 0.9 %, the individual retained samples shall be subjected to further testing, and the individual sample responsible for this result shall be identified. The compound feed producer concerned shall be informed, and the retained sample shall be tested.

If the PCR test result for the retained sample is greater than or equal to 0.9 %, the animal feed of the lot concerned shall be banned from being used for non-GM feeding immediately and withdrawn at the expense of the compound feed producer. The lot to be delivered next to the compound feed producer shall be sampled immediately.

- 8.7 If the sample of a compound feed producer has a GM content of 0.9 % or more twice in a half-year period (i.e. 6 months), the producer shall submit samples for PCR testing on a weekly basis. Weekly sample is to be understood as meaning a composite sample (from several non-GM products of a single compound feed producer).

9 General quality assurance

- 9.1 For reasons of general quality assurance, all compound feed producers shall, in the field of activity of "production of compound feed material" be obliged to participate in one of the following quality assurance programmes:

- AMA Pastus +;
- QS audit system of the animal feed industry;
- GMP +;
- FEMAS (Feed Materials Assurance Scheme);
- SFPS* (Swiss Feed Production Standard);
- QSGF Suisse* (quality assurance for cereals/animal feed);
- UFAS* (Universal Feed Assurance Scheme);
- EFISC (European Feed Ingredients Safety Certification); or
- another equivalent programme.

General note: Other equivalent programmes will be released as such by Donau Soja Association.

Note to *: The standard will be recognised if the following conditions are met: A quality control plan, consisting of samples from both incoming and outgoing produce, satisfies at least the requirements of the applicable analysis plan of the AMA-feedstuff monitoring Pastus+ (version 1 valid from January 2020; annex 1 to AMA-Feedstuff guideline pastus+ and pastus+ Regulation for Small Quantities) as far as the point "sampling frequencies as well as methodology and frequency of analyses" is concerned. Inspections are performed at least once every two years. A certificate of conformity (e.g. inspection report) is provided to Donau Soja Association and/or the Donau Soja certification body upon request.

10 Europe Soya contract compound feed producer

- 10.1 The compound feed producer and Donau Soja Organisation shall conclude the Europe Soya compound feed producer contract on the requirements to be met by the compound feed producer.



11 Directly commissioned inspections

- 11.1 The compound feed producer shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections.
- 11.2 The directly commissioned certification body shall take a composite sample of the Europe Soya soya from the entire company within the scope of their Europe Soya audit, and shall submit this sample for a PCR test.
- 11.3 Whenever possible, Europe Soya audits and certifications shall always be conducted together and in combination with non-GM inspections. If this is not possible, the Europe Soya audit shall be conducted at least once a year.
- 11.4 The certification body shall be obliged to observe secrecy towards third parties.
- 11.5 If the certified compound feed producer suspends or terminates their Europe Soya activity, Donau Soja Organisation may, at the expense of the compound feed producer, demand a final inspection by the directly commissioned certification body to verify all conformities from the last audit to the date of termination of the contract. The scope of the final inspection shall be reduced compared to a normal inspection, whereby the exact scope shall be determined by Donau Soja Organisation, if necessary after consultation with the directly commissioned certification body.

12 Supervisory inspections

- 12.1 The compound feed producer shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors. These bodies, or people, shall have been commissioned by Donau Soja Organisation and shall be obliged to observe secrecy towards third parties.