



Europe Soya Standard

The Europe Soya programme has been established to promote and propagate the cultivation, processing and marketing of GM-free, origin-controlled **quality soya from Europe**. Our aim is to develop and guarantee a GM-free protein supply in and from Europe.

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

Partners located in non-EU member states shall comply with the current legal provisions of EU law², particularly those concerning 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. Europe Soya soya bean farmers shall therefore undertake in writing to comply with these requirements.

Donau Soja certified produce may be used in Europe Soya programmes, but Europe Soya certified produce **shall not** be used in Donau Soja programmes due to a wider geographical scope.

1 Definition of "Europe Soya Region"

The countries and regions of origin for Europe Soya are defined in both political and geographical terms.

Enumeration of the countries in which Europe Soya can be produced is based on the Europe Soya Map on page 4 of this Standard. The borders of the Europe Soya region are based on the definition by Philip Johan von Strahlenberg with regard to the boundaries of the Russian border regions. The countries and geographical regions detailed on the Europe Soya Map (= Europe Soya cultivation areas) constitute a permanent feature of the Europe Soya Standard.

2 Definition of "GM-free"

Europe Soya soya is derived 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. Farmers producing Europe Soya are not allowed to grow any other GM crop either. Animal feed with the quality label "Europe Soya" shall be approved for use with livestock, the products of which can subsequently be marketed with the quality label "Ohne Gentechnik hergestellt"/"Produced without GMOs".

¹ Reference for the Donau Soja and Europe Soya Agreement for Logo Use: www.donausoja.org/en/downloads

² All relevant EU directives und EU regulations as well as the individual ILO conventions are listed in the **Annex** to the Europe Soja Guidelines.



GM-free labelling under the Europe Soya programme shall be based on the production, inspection and labelling guidelines as established by the Austrian ARGE Gentechnik-frei (Platform for GMO-Free Food Products, en.gentechnikfrei.at). Hence, the underlying legal provision regulating the GM-free status shall be the *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of "GMO-Free Production" of Food and its Labelling) published in the Austrian Food Codex (Codex Alimentarius Austriacus)³ in combination with its *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production)⁴. Products that fulfil the requirements of the German *Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*⁵ may, with respect to the criterion of being GM-free, also be labelled as "Europe Soya" provided that they are monitored by an independent certification body, as stipulated by the German Verband Lebensmittel ohne Gentechnik (VLOG, www.ohnegentechnik.org).

Apart from the possibility of providing non-GM certifications in accordance with the Austrian Food Codex or the German VLOG, the GM-free status can also be verified, within the scope of Europe Soya inspections and certifications, by inspections conducted in compliance with the requirements and the Inspection Standard of the "Non-GM Danube Region Standard"⁶, published in 2016.

3 Plant protection

The relevant legal provisions of EU law shall apply. Furthermore, the use of desiccants prior to harvest (e.g. glyphosate or diquat) shall be prohibited. The "Best Practice Manual"⁷, which was published by the Donau Soja Organisation and is continuously updated, shall be considered a non-binding recommendation for improving the profitability of soya bean production while, at the same time, reducing the use of plant protection products.

4 Nature reserves and change of land use

Europe Soya soya shall not be grown in national and international nature reserves where the production of crops is not allowed. The term "nature reserves" covers all different categories of protected areas for nature and landscape protection, including but not limited to national parks, landscape protection areas, Natura 2000 sites, Ramsar wetlands, UNESCO World Heritage Sites, natural parks, biosphere reserves. No new agricultural land shall be developed for Europe Soya soya production if this would result in loss of nature reserves, natural forests, riparian vegetation,

³ Reference for the *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.verbrauchergesundheits.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn

⁴ Reference for the *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

⁵ Reference for the *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html

⁶ Reference for the Non-GM Danube Region Standard and Inspection Standard: www.donausoja.org/en/downloads

⁷ An updated version of the Best Practice Manual is available at the Donau Soja website: www.donausoja.org/en/downloads



wetlands, moors, floodplains or steep slopes.⁸ Europe Soya soya bean farmers shall therefore undertake in writing to only use land (for the cultivation of Europe Soya soya) that was dedicated to agricultural use not later than 1 January 2008.

5 Additional requirements for farmers

Europe Soya soya bean farmers shall participate in the implementation of the CAP (Common Agricultural Policy)⁹ with mandatory *cross compliance* inspections. Alternatively, the farmer shall participate in an ISCC certification programme¹⁰ or an equivalent sustainability certification programme¹¹.

Inspections:

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

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

⁸ If any alteration of protected areas has taken place, the farmer shall be obliged to restore the affected areas to their former state.

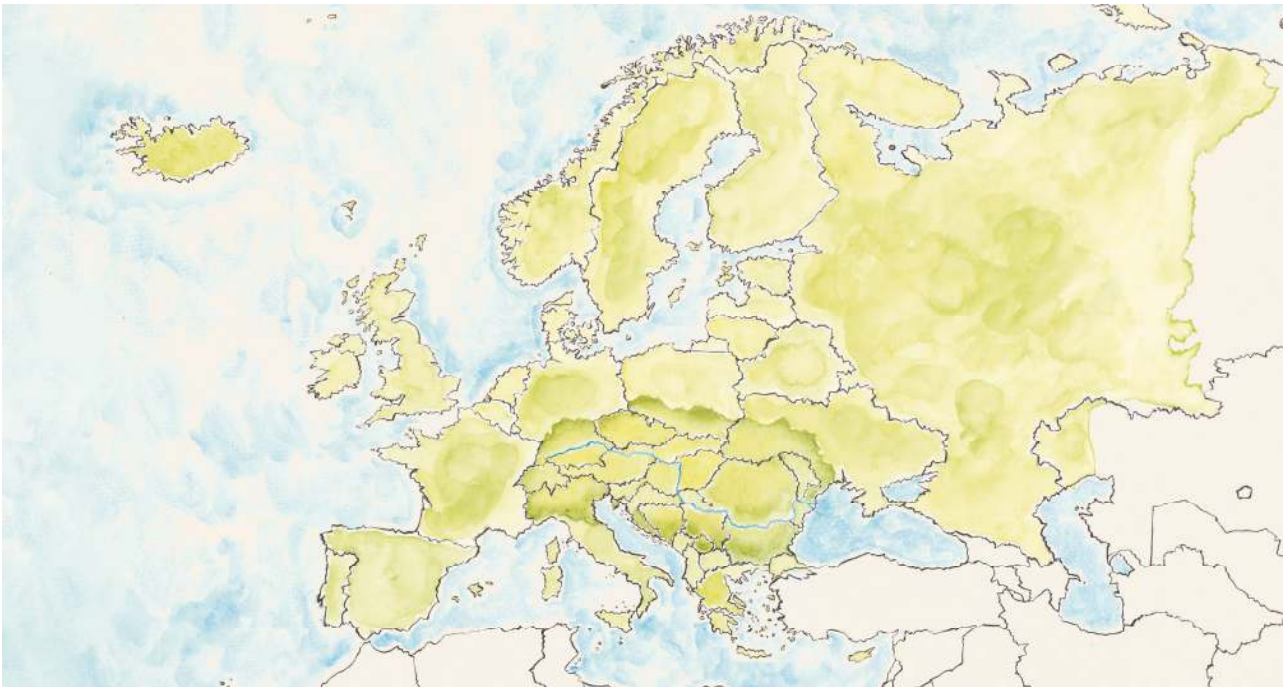
⁹ For relevant EU directives and EU regulations, refer to http://ec.europa.eu/agriculture/envir/cross-compliance_en

¹⁰ Refer to www.iscc-system.org for ISCC EU or ISCC Plus

¹¹ An equivalent standard shall at least comply with the FEFAC sustainability criteria (available at: www.fefac.eu/files/62592.pdf) and can be approved as such by the Donau Soja Board upon request.

Geographical map showing the Europe Soya cultivation areas

Europe Soya Map



All countries of the Donau Soja region are located within the Europe Soya defined area. The following countries are part of the Europe Soya Region: Albania, Austria, Belarus, Belgium, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Kazakhstan (European part), Latvia, Lithuania, Luxembourg, North Macedonia, Malta, Republic of Moldova, Montenegro, Netherlands, Norway, Poland, Portugal, Romania, Russian Federation (Nenetsia, Komi-Permyak, Sverdlovsk, Chelyabinsk, Orenburg), Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey (European part), Ukraine, United Kingdom of Great Britain and Northern Ireland.



Core Principles of Inspection (Overview)

Europe Soya is a product of controlled quality and origin. The detailed requirements specified in the Europe Soya Guidelines particularly provide the details for complete monitoring of the origin of the produce and for implementing a GM-free status along the entire processing chain.

As a rule, the relevant legal provisions of EU law shall apply for the production, treatment and processing of Europe Soya. The GM-free status is based on the minimum requirements set by the 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)¹². Compliance with the requirements of the German *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*¹³ with inspections performed in accordance with the German VLOG, as well as compliance with the Non-GM Danube Region Standard¹⁴ shall be deemed to be equivalent. Further requirements for compliance with the criterion of being GM-free can be recognised as being equivalent by the Donau Soja Association. In any case, animal feed shall be of a quality "geeignet zur Herstellung gentechnikfreier Lebensmittel" (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 detailed requirements R 04 (Soya Bean Primary Processor) and R 05 (Compound Feed Producer).

The Europe Soya inspection system is comprised of three stages:

- quality assurance and inspection systems operated by the participants in the Europe Soya system;
- external inspections and certifications commissioned by the licensees; these shall be conducted by ISO/IEC 17065:2012-accredited certification bodies approved by Donau Soja Organisation;
- supervisory inspections, in collaboration with an inspection body or inspectors, directly commissioned by Donau Soja Organisation; supervisory inspections shall be risk-based, in the order of 10 % of the licensed quantity of Europe Soya soya.

¹² Reference for the *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

Reference for the *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

¹³ Reference for the *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html

¹⁴ Reference for the Non-GM Danube Region Standard and Inspection Standard: www.donausoja.org/en/downloads



In order to guarantee comprehensive monitoring, all participants in the Europe Soya programme shall be subject to inspections. Confirmation of compliance with the Europe Soya Guidelines as a result of external inspections shall be passed on within the process chain in the form of a certificate. Lot-based issuance of certificates shall additionally take place from the agricultural collector to the primary processor. All participants in the Europe Soya system may be inspected at any time and on a risk basis within the scope of supervisory inspections (risk-based sampling).

Europe Soya farmers shall be registered with the agricultural collector. During this registration, farmers shall undertake to comply with the Europe Soya Guidelines on behalf of their agricultural holdings by signing the Declaration of Self-Commitment – Farmers (Soya Bean Producers)¹⁵, and shall accept risk-based sampling within the scope of supervisory inspections by Donau Soja Organisation.

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 Donau Soja Organisation in which they pledge, among other things, to:

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

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

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

Marketers intending to place products with the Europe Soya logo on the market, shall undertake not only to comply with the above mentioned points 1 to 3, but also to impose the obligation to comply with the Guidelines, together with the inspection requirements, on their suppliers and their suppliers' suppliers by contract.

The frequencies of both external inspections and supervisory inspections (risk-based sampling), as well as additional requirements for certain participants in the Europe Soya system, are based on the risk of (a) a different origin of the produce or (b) contamination of Europe Soya with GM crops.

¹⁵ For details, see document „Declaration of Self-Commitment – Farmers“



The countries where Europe Soya may originate from are 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;
- 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 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 inspection frequencies are specified in detailed requirements for all participants in the Europe Soya system.

May 2019



Europe Soya Inspection Frequency

	Risk Level 0 Europe Soya 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 ES	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 ES 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 ES 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	yes	yes	yes	yes
C	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)
F				
AP	ES 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	yes	yes	yes	yes
C	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)
F				

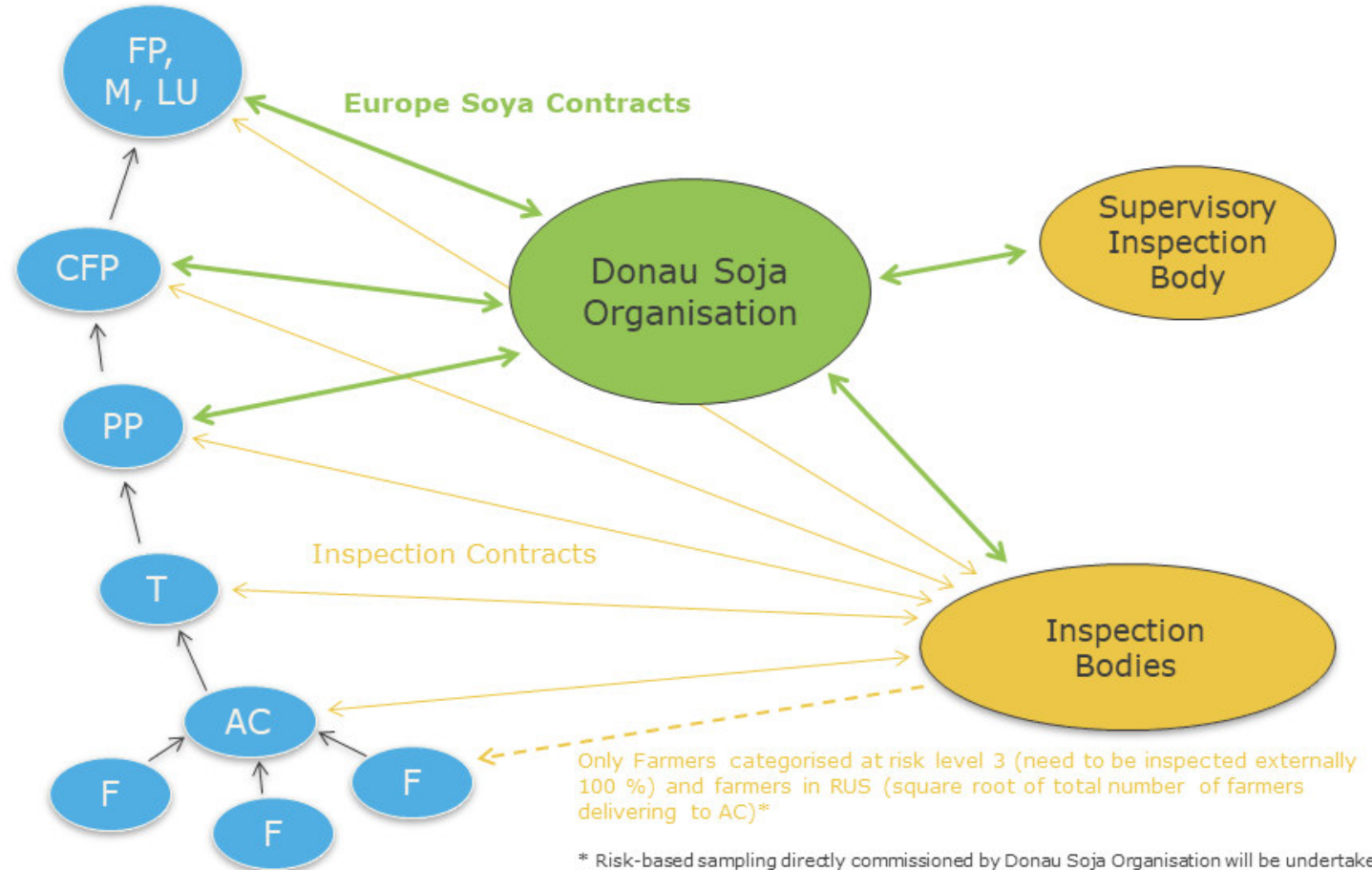
- (1) ACs are required to check the plausibility of the details given by Fs. Fs with registration obligation at risk level 3 need to be inspected externally once a year. Fs in RUS require annual external inspection in the context of their AC's certification, with an inspection frequency equal to the square root of Fs delivering to the AC.
- (2) Whenever possible, Europe Soya audits 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.

ES = Europe Soya; **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 supervisory inspections.



Europe Soya Contract System



Only Farmers categorised at risk level 3 (need to be inspected externally 100 %) and farmers in RUS (square root of total number of farmers delivering to AC)*

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

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 Europe Soya value chain