

Temporary Relaxation of the Requirements for Primary Processors (R 04) Relating to the Sourcing and Storage of Donau Soja and Europe Soya

Vienna, March the 8th 2022

**added on 01.04.2022 for compound feed producers (A05) regarding storage of
GMO-free soya meal together with DS/ES soya meal**

Background

Due to the current shortage of non-GM soya bean supply—caused by a combination of factors like unfavourable weather conditions or increased demand—, the requirements as stipulated in R 04 (for Donau Soja/Europe Soya [DS/ES] primary processors) and relating to the sourcing and storage of DS/ES soya beans can be relaxed, on written and reasoned request. This relaxation is temporary and applies until DS/ES soya beans from the 2022 harvest are available (November 2022).

The temporary relaxation of the DS/ES requirements for primary processors includes the following points:

1. Europe Soya certified soya beans are accepted for Donau Soja production.

The DS/ES primary processor is obliged to report the quantity of Europe Soya (ES) beans used to produce Donau Soja (DS) products—as part of, and together with, the monthly quantity reporting (as per R 04, 2.5)—to Donau Soja Organisation and the DS/ES certification body.

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

2. European non-GM soya beans may be accepted for Donau Soja/Europe Soya production.

Donau Soja Organisation may recognise soya beans of European origin as DS/ES soya beans provided the **following conditions** are met:

- The DS/ES primary processor sends a reasoned request for derogation (in any format) to Donau Soja Organisation. This request must include the following information:

- country of origin of the soya beans and name of the soya bean supplier;
 - quantity to be recognised as DS/ES soya beans;
 - expected date of delivery of the soya beans.
- Soya beans which are to be recognised as DS/ES soya beans must meet the “non-GM” and “European origin” requirements:
 - Non-GM soya beans must be suitable for use in non-GM production according to ARGE Gentechnik-frei (Platform for GMO-Free Food Products), Verband Lebensmittel ohne Gentechnik e.V. (VLOG) or an equivalent system. The non-GM status of the soya beans must be confirmed by appropriate accompanying documents (including but not limited to negative PCR test results).
 - The European origin of the soya beans must be confirmed by adding an appropriate remark in the accompanying shipping documents.
- Donau Soja Organisation will either commission an auditor to carry out sample checks of the soya beans requested to be recognised as DS/ES soya beans or will undertake these checks on its own. The samples must be analysed for both GMOs (via PRC testing) and their origin (via isotopic analysis). If the soya beans in question originate from risk level 3 production countries (Ukraine, Moldova) and Belorussia, an additional analysis for pesticide residues is required.
- The DS/ES primary processor applying for derogation must retain a counter sample of each delivery of European soya beans and store it in a separate place.

Storage: Quantities of European soya beans that have been recognised as DS/ES soya beans must be stored separately from other soya bean qualities. Soya beans must be stored separately from DS/ES soya beans until being recognised as such by Donau Soja Organisation.

Traceability: The DS/ES primary processor applying for derogation must agree with their suppliers that Donau Soja Organisation is authorised to trace the products one step back in the value chain. The corresponding checks may be performed as either requests for information (documents which have to be sent to Donau Soja Organisation on its request) or physical audits aimed at gathering all relevant information on European soya beans which are to be recognised as DS/ES soya beans (according to Regulation [EC] No 178/2002).

Costs of fulfilling the request for derogation: The request fulfilment costs differ depending on the country of origin of the soya beans in question, given that the scope of analyses to be performed by Donau Soja Organisation differs from one risk level to another.

- For soya beans originating from DS/ES production countries of risk level 0–2, the request fulfilment costs EUR 6.00 per tonne.
- For soya beans originating from DS/ES production countries of risk level 3, the request fulfilment costs EUR 8.00 per tonne (given that additional pesticide residue testing is needed).

The recognition of European soya beans as DS/ES soya beans takes place upon full payment of the invoice amount. Furthermore, a processing fee of between 50€ and 150€ (depending on company size and recognition volume) will be charged.

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

3. A mass balance model with European non-GM soya beans can be used to ensure the production of DS/ES.

DS/ES soya beans may be stored together with—or may be temporarily replaced by—European soya beans provided the **following conditions** are met:

- The DS/ES primary processor sends a reasoned request for derogation (in any format) to Donau Soja Organisation.
- Soya beans that can be stored together with—or can temporary replace—DS/ES certified soya beans must meet the “non-GM” and “European origin” requirements:
 - Non-GM soya beans must be suitable for use in non-GM production according to ARGE Gentechnik-frei (Platform for GMO-Free Food Products), Verband Lebensmittel ohne Gentechnik e.V. (VLOG) or an equivalent system. The non-GM status of the soya beans must be confirmed by appropriate accompanying documents (including but not limited to negative PCR test results).
 - The European origin of the soya beans must be confirmed by adding an appropriate remark in the accompanying shipping documents.
- The input quantity of DS/ES soya beans equals the output quantity of DS/ES soya products (taking into account the relevant conversion factor[s]) within

a cumulative period starting with the approval and lasting until the end of 2022.

- At the end of the cumulative period (by December 31, 2022), the quantity of DS/ES soya beans purchased during the cumulative period must be greater than or equal to the quantity of DS/ES soya products (meal, oil, etc.) sold during the cumulative period.
- At the end of each cumulative period, a bill of quantity must be submitted to both Donau Soja Organisation (quality@donausoja.org) and the commissioned certification body. This bill of quantity must include the following information:
 - quantity of DS/ES soya beans purchased during the cumulative period (input quantity of beans);
 - quantity of DS/ES soya bean meal and/or DS/ES soya bean oil sold during the cumulative period (output quantity of meal and oil);

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

Temporary Relaxation of the Requirements for Compound Feed Producers (R 05) Relating to the Sourcing and Storage of Donau Soja and Europe Soya

1. Europe Soya certified soya bean products are accepted for Donau Soja production.

The DS/ES compound feed producer is obliged to report the quantity of ES soya bean meal and/or ES soya bean oil used to produce DS compound feed to Donau Soya Organisation by the end of each calendar month.

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

2. A mass balance model with European non-GM soya bean oil can be used to ensure the production of DS/ES compound feed.

DS/ES soya bean oil may be stored together with—or may be temporarily replaced by—European soya bean oil provided the **following conditions** are met:

- The DS/ES compound feed producer sends a reasoned request for derogation (in any format) to Donau Soja Organisation.
- Soya bean oil that can be stored together with—or can temporary replace—DS/ES certified soya bean oil must meet the “non-GM” and “European origin” requirements:
 - Non-GM soya bean oil must be suitable for use in non-GM production according to ARGE Gentechnik-frei (Platform for GMO-Free Food Products), Verband Lebensmittel ohne Gentechnik e.V. (VLOG) or an equivalent system. The non-GM status of the soya bean oil must be confirmed by appropriate accompanying documents (including but not limited to negative PCR test results).
 - The European origin of the soya bean oil (or more precisely, the European origin of the soya beans used for producing the soya bean oil) must be confirmed by adding an appropriate remark in the accompanying shipping documents.
- The input quantity of DS/ES soya bean oil equals the output quantity of DS/ES soya bean oil used as single feed material or as an ingredient in compound feed within a cumulative period starting with the approval and lasting until the end of 2022.
 - At the end of the cumulative period (by December 31, 2022), the quantity of DS/ES soya bean oil purchased during the cumulative period must be greater than or equal to the quantity of DS/ES soya bean oil processed into DS/ES animal feed during the cumulative period.
 - At the end of each cumulative period, a bill of quantity must be submitted to both Donau Soja Organisation (quality@donausoja.org) and the commissioned certification body. This bill of quantity must include the following information:
 - quantity of DS/ES soya bean oil purchased during the cumulative period (input quantity of oil);
 - quantity of DS/ES soya bean oil (used as single feed material or as an ingredient in compound feed) sold during the cumulative period (output quantity of oil);
 - quantity of DS/ES animal feed sold during the cumulative period (output quantity of feed).

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

3. Storage of DS/ES soya meal together with European GMO-free soya meal:

The **storage of DS/ES soya meal together with European GMO-free soya meal** is possible in compliance with the required conditions for compound feed producers under point 2, which are defined for the storage of DS/ES soya oil together with European soya oil. The DS/ES compound feed producer sends a reasoned request for derogation (in any format) to Donau Soja Organisation.

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

Temporary Relaxation of the Requirements for Agricultural Processors (R 06a) Relating to the Sourcing and Storage of Donau Soja and Europe Soya

1. Europe Soya certified soya bean products are accepted for Donau Soja production.

The DS/ES agricultural processors (e.g. farms, where laying hens, fattening poultry, fattening pigs, beef cattle or dairy cattle are kept.) is obliged to report the quantity of ES soya bean meal and/or ES soya bean oil used to produce DS feed to Donau Soja Organisation by the end of each calendar month.

Validity period: lasts from the date of publication of this document until DS/ES soya beans from the 2022 harvest are available (November 2022).

For any questions, please do not hesitate to contact our Quality Management team:

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