



# Donau Soja Guidelines

January 2026

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# Donau Soja Standard

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

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 the products derived from them 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 compliance with the Donau Soja and Europe Soya Agreement for Logo Use<sup>1</sup>.

Partners located in both **EU and non-EU member states** shall comply with the current **legal provisions of EU law**<sup>2</sup>, particularly those concerning Deforestation, 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 rights<sup>2</sup> (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 (**Declaration of Self-Commitment**<sup>3</sup>).

Donau Soja-certified produce automatically meets the criteria required for **Europe Soya** certification (see website [www.donausoja.org](http://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", along with **additional social, environmental and economic aspects**.

- 1 European origin of soya beans and soya products
- 2 GM-free status of soya beans and soya 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

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<sup>1</sup> Reference for the Donau Soja and Europe Soya Agreement for Logo Use: [www.donausoja.org/en/downloads](http://www.donausoja.org/en/downloads)

<sup>2</sup> All relevant EU directives and EU regulations as well as the individual ILO conventions are listed in the **Annex 1** to the Donau Soja Guidelines.

<sup>3</sup> For details, see document *Declaration of Self-Commitment – Farmers*

All applicable 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<sup>2</sup>. However, the requirements of the Donau Soja Standard exceed the legal requirements passed by the EU in several aspects.<sup>4</sup>

## 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 products (Principle 1)

The countries and regions of origin for Donau Soja 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 basin as delineated by the International Commission for the Protection of the Danube River ([www.icpdr.org/main/danube-basin/countries-danube-river-basin](http://www.icpdr.org/main/danube-basin/countries-danube-river-basin)). 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 geographical regions detailed on the Donau Soja Map (= Donau Soja cultivation areas) constitute a permanent feature of the Donau Soja Standard.

### • GM-free status of soya beans and soya products (Principle 2)

Donau Soja soya beans and soya products are 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. 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" is 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)*<sup>5</sup>, 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);<sup>6</sup>

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<sup>4</sup> For details, see document *Requirements 01b: Donau Soja Principles of Soya Bean Cultivation*

<sup>5</sup> *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: [www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html](http://www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html)

<sup>6</sup> *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](http://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](http://www.bmwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf)

- Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard.<sup>7</sup>

In other words, 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 Standards<sup>6</sup>, 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, conflict of 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 respective legal provisions of EU law shall apply. Donau Soja soya bean farmers within the EU shall participate in the implementation of the CAP (Common Agricultural Policy) with mandatory conditionality inspections. 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 Stockholm and Rotterdam Conventions<sup>8</sup> as well as all substances the World Health Organization (WHO) has categorised as extremely hazardous (Class 1a) and highly hazardous (Class 1b)<sup>9</sup> 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 land 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)**

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<sup>7</sup> Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard:  
<http://www.donausoja.org/en/downloads>

<sup>8</sup> Stockholm Convention on Persistent Organic Pollutants: [www.pops.int/Portals/0/download.aspx?d=UNEP-POPS-COP-CONVTEXT-2017.English.pdf](http://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](http://www.pic.int/Portals/5/download.aspx?d=UNEP-FAO-RC-CONVTEXT-2017.English.pdf)

<sup>9</sup> World Health Organisation (WHO) Classification of Pesticides by Hazard:  
[https://www.who.int/ipcs/publications/pesticides\\_hazard/en/](https://www.who.int/ipcs/publications/pesticides_hazard/en/)

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 their farms. Any applicable data, such as yields, seed inputs, fertiliser application, pesticide application and fuel use, shall be recorded. The farmer shall implement measures to reduce greenhouse gas emissions and increase carbon sequestration.

- **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 1 for a list of relevant conventions of the International Labour Organization [ILO]<sup>10</sup>). 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.

#### **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 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 Donau Soja programme.

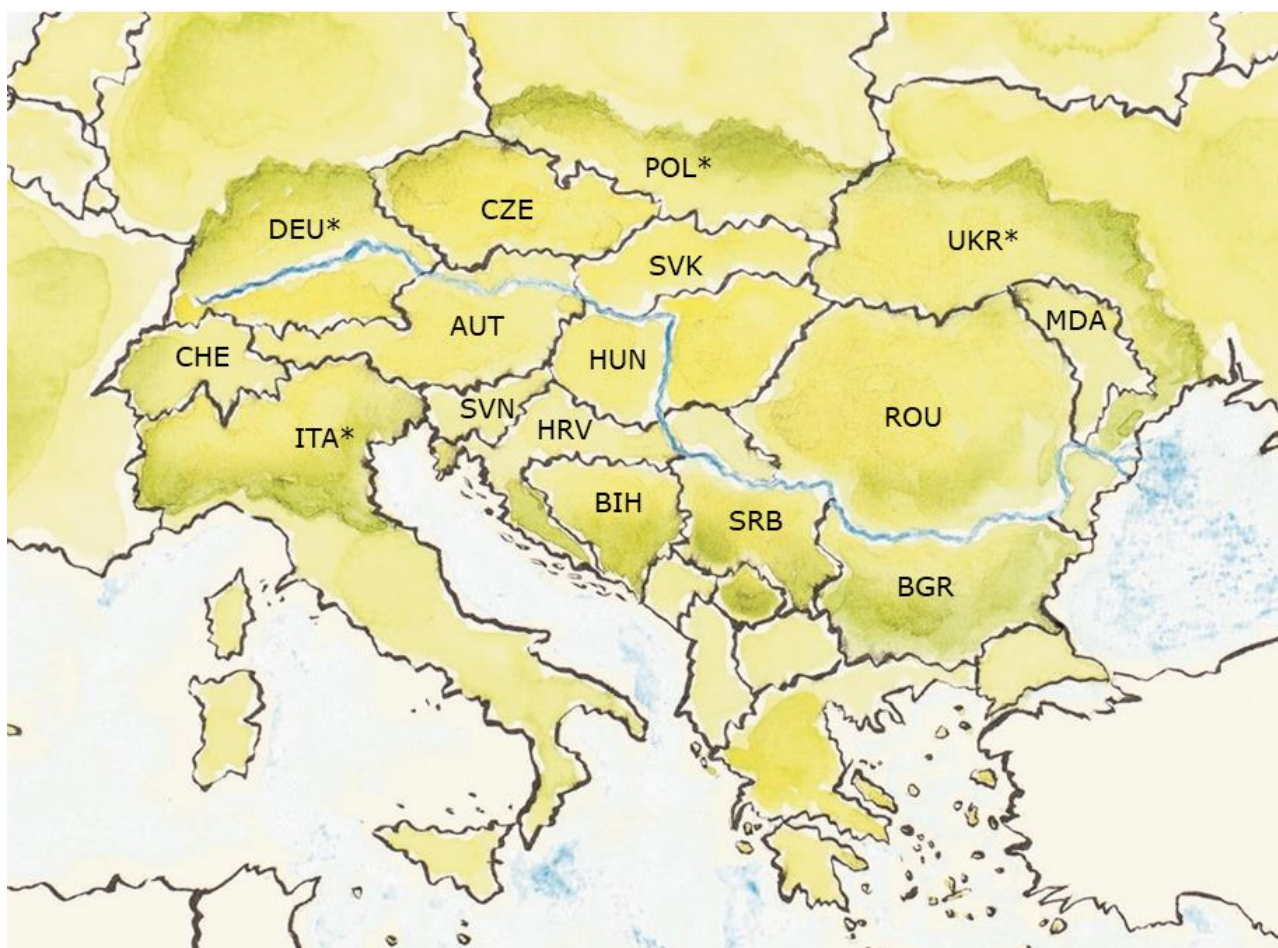
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<sup>10</sup> Introduction to the standards-related work of the International Labour Organization: [https://www.ilo.org/global/standards/information-resources-and-publications/publications/WCMS\\_672549/lang--en/index.htm](https://www.ilo.org/global/standards/information-resources-and-publications/publications/WCMS_672549/lang--en/index.htm)



Geographical map showing the Donau Soja cultivation areas

## Donau Soja Map



\* These countries are included with the following regions:

GERMANY: Bavaria, Baden-Württemberg

ITALY: Trentino Alto Adige, Friuli Venezia Giulia, Veneto, Emilia-Romagna, Lombardia, Piemont, Vallée d'Aoste

POLAND: Dolnoslaskie, Opolskie, Slaskie, Swietokrzyskie, Podkarpackie, Malopolske

UKRAINE: Uschgorod, Tschernowzy, Winniza, Odessa, Lwow, Ternopol, Chmelniczki, Iwano-Frankovsk

# Core Principles of Inspection (Overview)

Donau Soja is a product of controlled quality and origin. The detailed requirements specified in the Donau Soja Guidelines particularly provide the details for complete monitoring of the origin of the produce (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) <sup>11</sup> , 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);<sup>12</sup>
- Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard.<sup>13</sup>

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, Europe Soya products and Europe Soya 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 inspection systems carried out by the participants in the Donau Soja system themselves;
- external inspections and certifications commissioned by the licensees; these shall be conducted by ISO/IEC 17065:2012-accredited certification bodies approved by the Donau Soja Organisation;
- supervisory inspections, in collaboration with a certification body or inspectors, directly commissioned by the Donau Soja Organisation; integrity audits shall be risk-based; 10 % of the licensed quantity of Donau Soja soya beans and soya bean products must be sampled for testing.

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<sup>11</sup> EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG): [www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html](http://www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html)

<sup>12</sup> 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?6fdsdmn](http://www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsdmn)  
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](http://www.bmwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf)

<sup>13</sup> Non-GM Danube Region Production and Labelling Standard & Non-GM Danube Region Inspection Standard: <http://www.donausoja.org/en/downloads>



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 inspections. **Confirmation of compliance** with the Donau Soja Guidelines resulting from external inspections shall be passed on within the value chain in the form of a **certificate**. The certificates and the company's master data (name, scope and location) are published on the Donau Soja website. In the case of certified unprocessed soya beans, lot-based certificates (**lot certificates**) shall additionally be issued from the agricultural collector to the primary processor. In the case of certified processed soya products, **certificates of traceability** shall additionally be issued from the primary processor to the marketer where required by the EU Deforestation Regulation (EU) 2023/1115; these certificates can also be issued on a voluntary basis. All participants in the Donau Soja programme are required to keep the relevant documentation for at least 5 years, or longer if otherwise agreed by contract with Donau Soja Organisation. All participants in the Donau Soja system may be inspected at any time, and on a risk basis, in the form of risk-based sampling in supervisory inspections.

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 **Declaration of Self-Commitment – Farmers (Soya Bean Producers)**<sup>14</sup>, and shall be individually certified or part of a group certification. Additionally, the farmer shall accept risk-based sampling in supervisory inspections commissioned by the Donau Soja Organisation. The inspection scope may include fields where soya beans are cultivated, but may also include any non-soya growing areas, uncultivated 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 within the scope of integrity audits directly commissioned and paid by the Donau Soja Organisation;

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<sup>14</sup> For details, see document "Declaration of Self-Commitment – Farmers"

4. pay a Donau Soja fee to the 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 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 supervisory inspections.

Compound feed producers shall also conclude a contract with the Donau Soja Organisation in which they undertake to comply with the above mentioned points 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 points 1 to 3, but also to impose the obligation to comply with the Donau Soja Guidelines, together with the audit requirements, on their suppliers and their suppliers' suppliers by contract.

The frequencies of external inspections by certification bodies recognised by the Donau Soja Organisation and the frequency of supervisory inspections as well as additional requirements for Soya Bean Farmers (Producers) within the Donau Soja system shall be based on five risk categories (a-e).

- a. Contamination with GMO
- b. Geographical origin
- c. Pesticide use and desiccation practices
- d. Legal compliance
- e. Land conversion and soya bean cultivation in protected areas

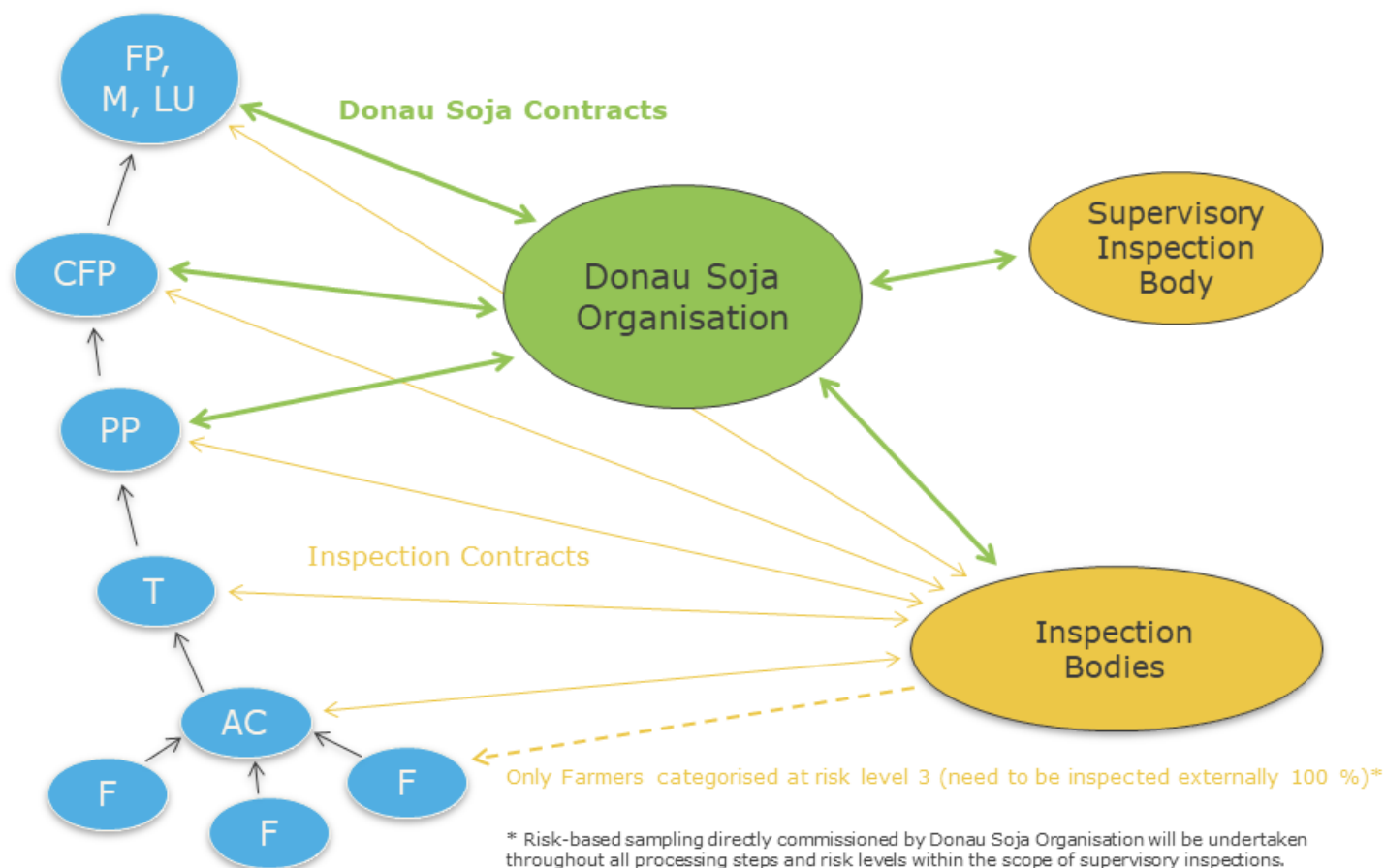
The frequencies of external inspections by certification bodies recognised by the Donau Soja Organisation and the frequency of supervisory inspections for certified companies in the supply chain, other than farmers, (e.g. collectors, traders, processors, compound feed producers, marketers) shall be based on the risk of contamination with GMO.

For details on the risk assessment see Annex 4 "Risk-Based Donau Soja Inspection System".

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 inspection frequencies shall be specified in the requirements for all participants in the Donau Soja system.

January 2024

# 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*

# **REQUIREMENTS 01a, Version 11**

## **Agricultural Producer (Farmer)**

### **General Requirements for Donau Soja Producers**

Purpose	Specify the general requirements to be met by Donau Soja soybean farmers (producers).
Definition	Soybean farmer (producer): agricultural holding growing and harvesting soybeans
Outline	1 Risk assessment .....1 2 Cultivation .....1 3 Delivery, settlement, certification as agricultural collector .....1 4 Registration of farmers .....2 5 Directly commissioned inspections .....2 6 Supervisory inspections .....3
Status	Version 11: released by the Board on 18.12.2025

#### **1 Risk assessment**

- 1.1 The farmer shall be assigned a "production area risk level" (= F-RL) based on the risk assessment (see Annex 04):
- F-RL 0: AUT, CHE, DEU, HUN, SVN;
  - F-RL 1: BGR, CZE, HRV, ITA, POL, SVK, SRB;
  - F-RL 2: BIH, ROU;
  - F-RL 3: MDA, UKR.

#### **2 Cultivation**

- 2.1 The farmer shall produce according to the Donau Soja Principles of Soybean Cultivation (see R 01b).

#### **3 Delivery, settlement, certification as agricultural collector**

- 3.1 The farmer shall hand over to the primary collector the Declaration of Self-Commitment – Farmers (Soybean Producers) signed by an authorised representative, and shall retain a copy of this declaration. Alternatively, the soybean farmer shall confirm on the accompanying shipping document (delivery note) both compliance with the Donau Soja Requirements and the quantity of Donau Soja soybeans delivered, and shall retain a copy of this confirmation. The delivery note shall include the following elements:
- Compliance Clause: "With my signature I confirm to have fully read, understood and followed the current Donau Soja Requirements for Farmers, as amended."
  - Farmer's signature
  - By signing, the farmer acknowledges the privacy policy at <https://www.donausoja.org/privacy-policy-2/> and agrees to the transfer of his data to the Donau Soja Organisation as well as to the storage and processing by

the Donau Soja Organisation for the purpose of system control. Furthermore, he confirms that relevant information is available for the submission of the due diligence declaration in accordance with the EU Deforestation Regulation (EUDR) and agrees to the transmission along the supply chain.

- 3.2 The agricultural producer must maintain a list of the geographical location of all soya cultivation plots and provide it to Donau Soja upon request. The geographical location of these plots shall be described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least 6 decimal digits. For plots of land of more than 4 hectares, the geolocation shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land.
- 3.3 For farmers in non-EU countries: The farmer shall hand over a list of all plots of land on which the soybeans were produced including the geographical location of these plots.<sup>1</sup>
- 3.4 Before delivering to the primary collector, the farmer is responsible for ensuring that the deforestation-free status of all soy cultivation areas has been checked and confirmed using an appropriate system <sup>1, 2</sup>
- 3.5 The farmer shall document all quantities of marketed soybeans with copies of all delivery notes and commercial invoices for agricultural collectors and other customers, and shall include a reference to the quality label "Donau Soja".
- 3.6 The farmer shall keep the relevant documentation for at least 5 years.
- 3.7 If soybean farmers, located in production areas of risk level 2 or 3 (F-RL 2 or F-RL 3), sell Donau Soja soybeans directly to a trader not acting as an agricultural collector, they need to be certified as an agricultural collector and may only sell Donau Soja soybeans by means of Donau Soja lot certificates (in accordance with paragraph 10.2 in R 02).

#### **4 Registration of farmers**

- 4.1 If the farmer is located in a production area of risk level 3 (F-RL 3):

The farmer shall notify Donau Soja Organisation by e-mail that they cultivate Donau Soja soya by 30 July of the current harvest year ([quality@donausoja.org](mailto:quality@donausoja.org)). Alternatively, the farmer can be registered by their primary collector (also by 30 July of the current harvest year).

#### **5 Directly commissioned inspections**

- 5.1 If the farmer is located in a production area of risk levels 0–2 (F-RL 0, F-RL 1 or F-RL 2):

The farmer shall either be individually certified or participate in a group certification as set out in paragraph 3 of the "Requirements for Group Certifications". The farmer shall be inspected in accordance with the risk assessment (see Annex 04, paragraph 1). For

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<sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115).

<sup>2</sup> Systems other than the Crop Insights system (<https://www.crop-insights.com>) may be used upon application.

farmers with F-RL 0 or 1, it is possible to recognize equivalent certification systems for inspection purposes upon application.

**5.2 If the farmer is located in a production area of risk level 3 (F-RL 3):**

The farmer shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake a chargeable first inspection as well as further annual inspections. The name of the certification body commissioned shall be announced at the same time as the farmer is registered according to paragraph 4.1.

The directly commissioned certification body shall take a composite sample of Donau Soja green soya plants from the fields within the scope of their Donau Soja audit, and shall conduct rapid GM tests (Roundup Ready). A positive rapid test result shall entail two further rapid GM tests. If any two of the three rapid tests conducted give a positive result, the farmer shall have a PCR test performed.

Please note: In soya plants older than 36 days, samples shall be taken from cotyledons or leaf pair 1 or 2.

Farmers may be exempt from rapid GM testing if they meet all of the following four criteria:

- the farmer delivers exclusively to a certified agricultural collector belonging to the same agricultural enterprise as this farmer;
- the farmer is inspected by the same certification body as the agricultural collector;
- the farmer does not receive their own certificate, but is listed in the annex to the certificate belonging to the agricultural collector;
- the directly commissioned certification body shall undertake a chargeable inspection of the farmer every year prior to harvest.

## **6 Supervisory inspections**

- 6.1 The farmer shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.



# Agricultural Producer (Farmer) – Principles of responsible crop cultivation

Purpose	Specify the Donau Soja principles of responsible crop cultivation.
Definition	Agricultural producer (farmer): agricultural holding growing and harvesting arable crops
Outline	<ul style="list-style-type: none"> <li>1 European origin of soya beans and soya products ..... 1</li> <li>2 GM-free status of arable crops and derived products..... 1</li> <li>3 Responsible farm management and community relations ..... 2</li> <li>4 Use of best practices in soil and nutrient management ..... 3</li> <li>5 Use of best practices in crop protection..... 3</li> <li>6 Use of best practices in water management ..... 4</li> <li>7 Use of best practices in waste management..... 5</li> <li>8 Responsible land use and biodiversity protection ..... 6</li> <li>9 Reduction of greenhouse gas emissions ..... 7</li> <li>10 Compliance with human and labour rights and safe working conditions 7</li> </ul>
Status	Version 02: released by the Board on 29 November 2023

## 1 European origin of soya beans and soya products

- 1.1 The farmer shall be geographically located within the Donau Soja region.

The countries and regions of origin of Donau Soja arable crops are defined in both political and geographical terms. The enumeration of the countries in which Donau Soja can be produced is based on the list of countries in the Danube river basin as delineated by the International Commission for the Protection of the Danube River ([www.icpdr.org/main/danube-basin/countries-danube-riverbasin](http://www.icpdr.org/main/danube-basin/countries-danube-riverbasin)). The Donau Soja region consists of the following European countries:

Austria (AUT), Bosnia and Herzegovina (BIH), Bulgaria (BGR), Croatia (HRV), Czech Republic (CZE), Germany (DEU, Bavaria and Baden-Württemberg only), Hungary (HUN), Italy (ITA, Trentino Alto Adige, Friuli Venezia Giulia, Veneto, Emilia-Romagna, Lombardia, Piemonte and Vallée d'Aoste only), Moldova (MDA), Poland (POL, Dolnoslaskie, Opolskie, Slaskie, Swietokrzyskie, Podkarpackie and Malopolske only), Romania (ROU), Serbia (SRB), Slovakia (SVK), Slovenia (SVN), Switzerland (CHE), Ukraine (UKR, Zakarpattia, Chernivtsi, Vinnytsia, Odesa, Lviv, Ternopil, Khmelnytskyi, Ivano-Frankivsk regions only).

## 2 GM-free status of arable crops and derived products

- 2.1 The farmer shall only grow GM-free arable crop varieties either listed in the EU common catalogue of plant varieties or in the respective national catalogue of plant varieties. Only these varieties shall have been used the last three years.
- 2.2 The farmer shall not have grown any other GM crop (e.g. GM maize) for one year.

2.3 If the farmer is located in a risk level 3 production area:

The farmer shall use certified seeds only and shall document this with invoices covering the purchase of the certified seeds.

2.4 The farmer shall document all quantities of arable crop, both grown and harvested, by keeping their own records.

2.5 The farmer shall not use genetically modified organisms or products produced from or by GMOs. As to agricultural inputs that are marketed as originating either from GMOs or from GM-free production (such as plant protection products, fertilisers and soil conditioners), only products labelled as GM-free shall be used. This confirmation is waived for products where, according to our current knowledge, no practical methods are known which would suggest that these products are GMOs, contain GMOs or were produced from GMOs or using GMOs. This, for example, currently applies to pure minerals, mineral fertilisers, chemical or synthetic active substances of plant protection products and certain micro-organisms.

### **3 Responsible farm management and community relations**

3.1 The farmer shall conduct business with integrity, respecting applicable laws, including but not limited to tax, anti-corruption, trade and customs regulations and avoiding all forms of bribery, conflicts of business interest and fraudulent practices.

3.2 The farmer shall have basic economic documentation appropriate to the farm size, including, but not limited to, records of costs, yields, income and profitability.

3.3 The farmer shall be aware of and follow the recommendations contained in the Donau Soja Best Practice Manual.

3.4 The farmer shall assess the environmental and social impacts of current or planned activities on their land. The farmer shall also assess the impact of their activities as it pertains to the wider community.

3.5 The farmer shall implement appropriate measures to allow for the coexistence of different production systems.

3.6 *In areas with traditional land users:* Where rights have been relinquished by traditional land users, there shall be documented evidence present showing that the affected communities are compensated subject to their free, prior, informed and documented consent (FPIC). In the case of disputed use rights, a comprehensive, participatory and documented community rights assessment shall be carried out and the recommendations from this assessment shall be followed.

3.7 As for communication with local communities, communication channels shall be in place (written sign or website with the following information: email address, mobile phone number, P.O. box address) that adequately enable communication between the farmer and the community. The communication channels shall have been made known to the local communities.

3.8 The farmer shall deal with complaints and grievances from workers, neighbours, local communities and traditional land users in an appropriate way and shall maintain

documented evidence. In case a relevant competent authority requires the farmer to react to a complaint in a certain way, the farmer will do so in a timely manner.

- 3.9 The complaint mechanism (e.g. appointed independent ombudsman; written complaint form, being accessible via email, telephone or postal mail) is transparent, has been made known and is available to all workers, local communities and traditional land users.

#### **4 Use of best practices in soil and nutrient management**

- 4.1 The farmer shall comply with relevant local and national legislation related to soil management.
- 4.2 The farmer shall ensure that crops are grown on suitable soils.
- 4.3 The farmer shall take appropriate measures to protect and improve the soil and to avoid erosion and soil compaction. These shall include, but not be limited to a ban on burning stubble, crop rotation and the use of cover crops, the cultivation of legumes and balanced fertilization.
- 4.4 The farmer shall take appropriate measures to establish a minimum level of soil cover in the most sensitive periods. These shall include, but not be limited to, sowing a winter crop after the harvest, sowing cover crops, leaving crop residues on the soil surface, mulching and non-turning tillage measures.
- 4.5 The farmer shall include legumes in their crop rotation or develop and implement a crop rotation plan.
- 4.6 The farmer shall apply organic and mineral fertilisers from trustworthy and legal sources.
- 4.7 The farmer shall keep records of fertiliser application.

#### **5 Use of best practices in crop protection**

- 5.1 The farmer shall comply with all relevant local, national and EU level plant protection legislation.
- 5.2 Negative environmental and health impacts of phytosanitary products shall be reduced by implementing systematic, recognised Integrated Crop Management techniques.
- 5.3 An Integrated Crop Management plan shall be developed and implemented, including adequate and continuous monitoring of crop health, use of non-chemical and chemical control methods and measures to improve crop resilience.
- 5.4 The farmer shall have acquired knowledge on the implementation of Integrated Pest Management systems through training, education or advice. Integrated Pest Management principles and corresponding techniques are implemented to avoid harm to human health, wildlife and/or plant biodiversity; as well as to soil, water and air quality.
- 5.5 The farmer shall only apply agrochemicals authorised for use in the EU.

- 5.6 The use of agrochemicals listed in the Stockholm Convention and Annex III to the Rotterdam Convention<sup>1</sup> shall be prohibited.
- 5.7 The use of agrochemicals the active ingredients of which are categorised as Class 1a or 1b in the World Health Organization (WHO) Recommended Classification of Pesticides by Hazard<sup>2</sup> shall be prohibited (e.g. tefluthrin, zeta-cypermethrin or zinc phosphide).
- 5.8 The use of desiccants prior to harvest (e.g. glyphosate or diquat) shall be prohibited.
- 5.9 There shall be no application of pesticides within 30 meters (or more if required by national law) of any populated area or water body, and all necessary precautions shall be taken to prevent people from entering recently sprayed areas.
- 5.10 Aerial application of pesticides (aerial spraying) shall be prohibited.
- 5.11 The staff dealing with plant protection products shall be competent and shall envisage the use of non-chemical alternatives to pesticides.
- 5.12 The farmer shall ensure that any use of biological control agents complies with national legislation.
- 5.13 When using a plant protection product, the farmer shall follow:
- the manufacturer's instruction for use (to avoid under- or overdosing);
  - the label recommendations;
  - the appropriate pre-harvest and re-entry intervals.
- 5.14 The farmer shall ensure that there is regular maintenance of machinery, equipment and materials in order to ensure safe functioning of these devices.
- 5.15 The application of agrochemicals shall be duly documented.
- 5.16 The farmer shall manage and dispose of waste, including hazardous materials as well as agrochemicals and their containers, in such a manner as to avoid any risks to humans and the environment.

## 6 Use of best practices in water management

- 6.1 Existing water rights, both formal and customary, shall be respected, and water use shall be in compliance with applicable regulations and local legislation.
- 6.2 *In case of irrigation:* The farmer shall hold a valid water extraction license and ensure that any use of water, other than rainwater, has been approved by the relevant authorities. The farmer shall also ensure that their practices (e. g. water extraction) do not impact sensitive wetlands or swamps in the vicinity of their operation.

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<sup>1</sup> Stockholm Convention on Persistent Organic Pollutants: <https://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: <https://www.pic.int/Portals/5/download.aspx?d=UNEP-FAO-RC-CONVTEXT-2017.English.pdf>

<sup>2</sup> The WHO Recommended Classification of Pesticides by Hazard: <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>

- 6.3 The farmer shall ensure that the water used for irrigation is in compliance with applicable regulations, including food safety legislation.
- 6.4 There shall be monitoring, appropriate to scale, of water quality and water use on the farm. The farmer shall implement actions to reduce water use wherever possible.
- 6.5 The farmer shall implement Good Agricultural Practices to minimise diffuse and localised impacts on surface and ground water quality from chemical residues, fertilisers, erosion or other sources. This shall include but not be limited to the following:
- The farmer shall take appropriate measures to avoid pollution from waste water.
  - The farmer shall employ practices to prevent the runoff of any chemical, mineral or organic substance (including crop protection products, fertilisers and manure).
  - The quality of water bodies on or close to the farm and farm land shall be protected by establishing riparian buffer strips along water courses.
  - Any direct evidence of localised contamination of ground or surface water shall be reported to, and monitored in collaboration with and as required, by local authorities.
- 6.6 The farmer shall use sewage sludge in line with best practices and comply with applicable regulations and local legislation:
- The farmer shall follow applicable regulations regarding the analysis and treatment of raw sewage sludge before use.
  - The farmer shall apply Good Agricultural Practices when applying treated sewage sludge to soils.
  - Sludge shall not be applied directly to the crop after flowering.
  - The discharge of sewage must not contaminate water, soils or crops.

## **7 Use of best practices in waste management**

- 7.1 The farmer shall comply with all relevant legislation for the safe and proper handling, storage, transportation and disposal of waste material, especially hazardous substances.
- 7.2 The burning on any part of the property of crop residues or waste, or as part of vegetation clearance, shall not be allowed, unless it is required by national legislation as a sanitary measure.
- 7.3 The farmer shall handle biodegradable waste and agricultural by-products appropriately to avoid pollution and prevent pathogenic contamination.
- 7.4 The premises shall have adequate provisions for waste disposal.
- 7.5 Waste materials shall be stored in a proper and legal manner.

- Waste shall be stored in a segregated manner (e.g. hazardous waste is store separately from non-hazardous waste, waste is not stored together with non-waste).
  - Waste storage areas shall be located an appropriate distance from housing, water bodies and conservation areas.
- 7.6 The farmer shall establish procedures and make equipment available to deal with accidents with and spills of crop protection products, fertilisers and fuels.
- 7.7 The farmer shall implement measures to reduce, reuse and recycle waste where possible.

## **8 Responsible land use and biodiversity protection**

- 8.1 Deforestation and conversion of natural ecosystems including, but not limited to, forests, wetlands, peatlands, grasslands, riparian areas or steep slopes for the cultivation of Donau Soja soya beans and other arable crops 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 expansion of agricultural land for the cultivation of Donau Soja soya beans and other arable crops.
- 8.2 The farmer shall take appropriate measures to protect carbon-rich ecosystems such as wetlands and peatlands; this shall include but not be limited to a ban on drainage and a ban on the burning of peatland.
- 8.3 The farmer shall not grow Donau Soja soya beans and other arable crops in the following protected areas unless the use of such areas for agricultural purposes is explicitly allowed in the respective management plan while respecting the protection goals within the protected area:
- areas designated by law or by the relevant authority for nature protection purposes;
  - areas for the protection of rare, threatened or endangered ecosystems or species (recognised by international agreements or the European Commission or included in lists drawn up by intergovernmental organisations or the International Union for Conservation of Nature [IUCN]).
- 8.4 In case of any alteration of protected areas, these areas shall be restored to their former state, or legally approved compensating actions shall be taken.
- 8.5 The farmer shall identify natural and semi-natural habitats, water courses and production areas on their farm and implement measures to avoid damage or deterioration of habitats and to enhance biodiversity. Measures shall include but not be limited to the following:
- The farmer shall maintain or, if necessary, establish land devoted to non-productive features or areas, including, but not limited to, set-aside land, buffer zones or special landscape features.



- The farmer shall take appropriate measures to minimise land fragmentation and shall maintain existing ecological corridors.
  - The farmer shall retain landscape features, including, but not limited to, hedgerows, ditches or woods. The farmer shall not cut hedges and trees during the bird breeding and nesting season.
  - The farmer shall maintain or restore areas of natural vegetation around bodies of water (riparian vegetation and floodplains) and on areas sensitive to erosion (steep slopes and hills).
  - The application of plant protection products or fertilisers in riparian buffer strips or in natural and semi-natural habitats shall be prohibited.
- 8.6 The farmer shall protect rare, threatened or endangered species on the farm including, but not limited to, a ban on gathering or hunting threatened or endangered species as well as illegal hunting or fishing.
- 8.7 The farmer shall take appropriate measures to prevent the spreading of invasive alien species by preventing their introduction, by removing them as quickly as possible once detected and by notifying local authorities when their spreading cannot be stopped locally.

## **9 Reduction of greenhouse gas emissions**

- 9.1 The farmer shall have knowledge of how to reduce greenhouse gas emissions and increase the sequestration of greenhouse gases on the farm.
- 9.2 The farmer shall monitor relevant data contributing to greenhouse gas emissions (e.g. yields, seeds, fertiliser, pesticide and fuel use).
- 9.3 The farmer shall identify and implement measures to minimise greenhouse gas emissions on the farm, including, but not limited to, reducing the use of fossil fuels (e.g. by increasing the share of renewable energies, implementing precision agriculture techniques, controlled traffic farming [CTF] or lighter machinery).
- 9.4 The farmer shall identify and implement measures to increase carbon sequestration on the farm (e.g. by planting cover crops or applying intercropping practices).

## **10 Compliance with human and labour rights and safe working conditions**

- 10.1 The farmer shall comply with fundamental conventions of the International Labour Organization (ILO Conventions). This shall include but not be limited to:
- All workers shall have the right to form or join organisations that defend their interests, and shall have the right to negotiate for fair wages and working conditions.
  - The effective functioning of worker associations/organizations of workers shall not be impeded. Representatives shall not be subject to discrimination and shall have access to their members in the workplace on request.

- No forced, compulsory, bonded, trafficked or otherwise involuntary labour shall be used in any stage of production. Workers shall not be subject to corporal punishment, mental or physical oppression or coercion, verbal or physical abuse, sexual harassment or any kind of intimidation. No workers of any type shall be required to lodge their identity papers with anyone, unless required by law.
  - Child labour shall be forbidden. Children under 15 years (or at a higher age as established in national law) shall not perform any productive work. Young workers (15–18 years) must not undertake hazardous work that jeopardizes their health and welfare, including by interfering with their education.
  - Equal work must be equally paid. All workers shall have equal access to training and benefits, and shall have equal opportunities for promotion and for filling any available position.
  - There shall be no engagement in, support for, or tolerance of any form of discrimination.
- 10.2 The working conditions of all workers shall be in line with human rights as well as with local, national and EU-wide regulatory requirements and relevant collective bargaining agreements.
- 10.3 All workers shall have a written contract in a language they can understand. In those countries where there are no requirements for formal labour agreements between workers and employers, alternative documented evidence of a labour relationship shall be present.
- 10.4 Farmers shall implement policies and procedures to address workers grievances.
- 10.5 Gross wages, benefits and social security, holiday entitlement, parental leave, periods of notice, etc. shall comply with the relevant legislation and industry-specific agreements.
- 10.6 The work week shall be set according to local and national laws, shall be consistent with local industry standards, and shall not routinely exceed the maximum of 48 hours per week.
- 10.7 Overtime in excess of 12 hours per week shall only be allowable if it happens in extraordinary, limited periods where there are time constraints or risks of economic loss and where conditions regarding overtime in excess of 12 hours per week have been agreed between workers and management.
- 10.8 Overtime shall always be voluntary and shall be paid in accordance with local and national laws or sector agreements.
- 10.9 Working hours and overtime shall be monitored.
- 10.10 Deductions from wages for disciplinary purposes shall not be made unless legally permitted. Wages paid shall be recorded by the employer.
- 10.11 Producers and their employees shall demonstrate an awareness and understanding of health and safety matters.
- A written health, safety and hygiene policy shall be in place on the farm.

- Relevant health and safety risks shall be identified, procedures shall be developed by employers to address these risks, and these procedures shall be monitored.
  - Workers shall receive adequate health and safety training.
  - Dangerous and/or complex work shall be carried out by qualified workers.
  - Restrictions related to hazardous activities shall be in place on the farm.
- 10.12 Accident and emergency procedures shall be in place and instructions must be clearly understood by all workers. Procedures and measures shall include but not be limited to:
- the availability of equipment to prevent and handle accidents (e.g. protective clothing, first aid kits, safety procedures);
  - the availability of qualified personnel with first aid skills.
- 10.13 All accidents shall be recorded and shall be reported to the local authority as required.
- 10.14 All workers shall have access to clean and safe drinking water, adequate sanitary facilities and protective equipment.
- 10.15 All workers living on the farm shall have access to adequate, safe and clean facilities.
- 10.16 All children living on the farm shall have access to quality primary school education.

## Agricultural Soybean Collector and Primary Collector

Purpose	Specify the requirements to be met by agricultural Donau Soja soybean collectors and Donau Soja primary collectors.
Definition	<p>Agricultural soybean collector: company accepting, storing and passing on soybeans; where applicable, they also clean and dry the beans (slight heating to ensure storability, no toasting)</p> <p>Primary agricultural soybean collector (primary collector): company accepting and/or storing soybeans obtained directly from the soybean producer</p>
Outline	<p>1 Risk assessment ..... 1</p> <p>2 Incoming soybean deliveries ..... 1</p> <p>3 Soybean storage..... 3</p> <p>4 Acquisition of lot certificates ..... 4</p> <p>5 Outgoing soybean deliveries ..... 4</p> <p>6 Soybean stock management ..... 5</p> <p>7 Quality management..... 5</p> <p>8 Directly commissioned inspections ..... 7</p> <p>9 Supervisory inspections ..... 8</p> <p>10 Special forms of primary collection ..... 8</p> <p>11 Group certification ..... 9</p> <p>12 Miscellaneous ..... 9</p>
Status	Version 12: released by the Board on 18.12.2025

### 1 Risk assessment

- 1.1 The agricultural collector shall be assigned an "agricultural collector risk level" (= C-RL) based on the deliveries accepted and taken into storage by them.
- C-RL 0: only Donau Soja soybeans are stored;
  - C-RL 1: only GM-free crops are stored, but GM-free soybeans of other origins (without Donau Soja certificates) may also be stored;
  - C-RL 2: only GM-free soybeans (even without Donau Soja certificates) are stored, but other GM crops (e.g. maize) may also be stored;
  - C-RL 3: GM soybeans and GM soybean meal may also be stored; the primary collector is located in a production area of F-RL 2 or 3, with a GM risk level 2 or 3

### 2 Incoming soybean deliveries

- 2.1 The primary collector shall obtain from the farmers delivering Donau Soja soybeans to the collector a signed Declaration of Self-Commitment – Farmers (Soybean Producers) for each Donau Soja soybean delivery or the entire Donau Soja quantity delivered and retain this declaration. Alternatively, the primary collector shall obtain for each Donau Soja quantity delivered a signed accompanying shipping document in compliance with the Requirements R 01a, paragraph 3.1 (delivery note), and shall retain this

document. The primary collector shall be obliged to inform soybean farmers about the latest Donau Soja Requirements.

The primary collector shall keep an up-to-date list of all farmers delivering Donau Soja soybeans to the collector.

2.2 If the farmer delivering soybeans to the primary collector is located in a production area of risk level 0-2 (F-RL0, F-RL1, F-RL2):

The primary collector accepts produce either from individually certified Donau Soja soybean producers or shall establish a group certification including all Donau Soja soybean producers delivering to the primary collector (see Group certification paragraph 3).

2.3 If the farmer delivering soybeans to the primary collector is located in a production area of risk level 3 (F-RL 3):

The primary collector shall verify that the farmer has registered in due time with Donau Soja Organisation, i.e. by 30 July of the respective harvest year (see Requirements R 01a, paragraphs 4.1 and 5.1).

The primary collector shall keep an up-to-date list of all farmers belonging to the same agricultural enterprise as this collector and delivering Donau Soja soybeans exclusively to this collector (see Requirements R 01a, paragraph 5.1). These farmers shall be listed in the annex to the certificate belonging to the primary collector.

2.4 The primary collector shall document each soybean supplier, including their EU registration number (or an equivalent specification in non-EU countries), the quantity delivered by them, the country of origin, the geolocation<sup>1</sup> of all plots of land on which the soybeans were produced and the quality label ("Donau Soja") and shall keep the relevant documentation for at least 5 years.

2.5 The primary collector shall check the plausibility of the details given by all Donau Soja soybean farmers. This plausibility check shall be based on calculations of the size of areas under crops and the quantities delivered by the soybean farmers to the collector.

2.6 The agricultural collector/primary collector shall take a retained sample of each soybean lot accepted by them, and shall store this sample for at least one year safely and without influencing its quality, ensuring traceability.

2.7 The storage period of retained samples can be reduced to six months from the date of sale if the following two requirements are met:

- the primary collector can demonstrate that the storage period for the Donau Soja soybeans concerned has also been reduced; and

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<sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.

- the primary collector is located in a production area of GM-risk level 1 (GM-RL 1) and if the farmer delivering soybeans to this collector is also located in such a production area.

Composite samples shall be permitted as long as they do not exceed five individual deliveries (e.g. truck, tractor) and 100 tonnes per day. In this case, the primary collector shall additionally conduct rapid GM tests on each delivery unit (vehicle). The primary collector shall also document the results of these tests as well as the origin of the individual deliveries.

Please note: Sampling and storage shall be in accordance with the customs of the Agricultural Products Exchange in Vienna (Börse für landwirtschaftliche Produkte in Wien) or with the GAFTA Sampling Rules No. 124 (chapter 3 „General“, chapter 4 „Method of Drawing Samples“, chapter 5 „Sample Labels“).

### **3 Soybean storage**

- 3.1 The agricultural collector/primary collector shall ensure that no mixing of different soybean qualities occurs. For this purpose, the use of each soybean lot delivered to the collector shall be documented in the individual transfer and loading cells. The collector shall refer to soybeans certified as “Donau Soja” in internal documentation and ensure correct declaration on site.
- 3.2 The primary collector shall send harvest declarations unprompted to both their contracted certification body and Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)) on the following occasions:
  - main declaration: notification after the expected end date of incoming delivery, but no later than 30 November of the current calendar year;
  - post-declaration: notification if the primary collector still accepted produce following a main declaration. Post-declarations shall be provided within 30 days after delivery including a justification, for the quantity to be recorded in the Donau Soja system. Post declarations which are made after the defined deadline shall be agreed in advance with Donau Soja Organisation.

Each harvest declaration shall include the following information:

- reason for the notification: main declaration or post-declaration (see above);
- stock of Donau Soja soybeans;
- stock of soybean qualities other than Donau Soja;
- name, postal and e-mail addresses of the primary collector;
- name, postal and e-mail addresses of the delivering Donau Soja soybean farmers;
- harvest year;
- country of origin and, where relevant, parts thereof;
- date of incoming deliveries and delivery volume of Donau Soja soybean farmers.



- geolocation<sup>2</sup> of all plots of land on which the crop was produced;

#### **4 Acquisition of lot certificates**

4.1 The agricultural collector/primary collector shall send lot certificate requests to their certification body. Each such request shall include the following information:

- name and contact information of the buyer;
- where applicable, codes of the lot/traceability certificates related to the quantity of Donau Soja soya to be sold;
- type, trade name and quantity of soybeans to be sold as Donau Soja soya or to be delivered to the buyer;
- harvest year;
- reference numbers of accompanying documents (e.g. contracts, delivery notes);

4.2 The agricultural collector/primary collector shall accept as response from their certification body the lot certificate in the form of a signed PDF document. The lot certificate shall include the following information:

- name, postal and e-mail address of the seller;
- name, postal and e-mail address of the buyer;
- code of the certification body;
- code of the lot/traceability certificate;
- quantity of the soybean lot/product unit certified as Donau Soja;
- harvest year;
- reference number of accompanying documents (e.g. contracts, delivery notes);
- "Donau Soja" logo.

Additionally, data on the geolocation<sup>2</sup> of the plots of land on which the soybeans were produced can be provided on request.

4.3 The maximum quantity of Donau Soja soybeans comprised by a lot is the quantity stipulated in the supply contract.

#### **5 Outgoing soybean deliveries**

5.1 The agricultural collector/primary collector shall send the lot certificates to the buyer of the corresponding lots.

5.2 The agricultural collector/primary collector shall document each soybean lot delivered, including the quantity delivered, the quality label ("Donau Soja"), the buyer's EU registration number (or an equivalent specification in non-EU countries) and codes of the corresponding lot certificates.

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<sup>2</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.

- 5.3 The agricultural collector/primary collector shall take a retained sample of each soybean lot delivered, and shall store this sample for at least one year safely and without influencing its quality.

Please note: Sampling and storage shall be in accordance with the customs of the Agricultural Products Exchange in Vienna (Börse für landwirtschaftliche Produkte in Wien) or with the GAFTA Sampling Rules No. 124 (chapter 3 „General“, chapter 4 „Method of Drawing Samples“, chapter 5 „Sample Labels“).

- 5.4 The agricultural collector/primary collector shall refer to soybeans certified and delivered (sold) to a customer as “Donau Soja” (“DS”) in internal documentation and on all delivery notes, invoices, as well as packaging (if applicable).

## 6 Soybean stock management

- 6.1 In the following cases, the agricultural collector/primary collector shall send to their certification body and Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)) quantity amendment notifications regarding the stock of Donau Soja soybeans, specifying the reason for the notification:

- carry-over: remaining stock from the previous harvest year (notification by 31 August of the current calendar year, otherwise these quantities in store shall no longer qualify as Donau Soja);
- deviation of quantities delivered: outgoing deliveries deviating from contracted delivery quantities.

## 7 Quality management

### 7.1 In-house QM System

If the agricultural collector/primary collector is **located in a production area of GM-risk level 2 or 3 (GM-RL 2 or GM-RL 3),**

or

If the agricultural collector/primary collector accepts produce from **a production area of GM- risk level 2 or 3 (GM-RL 2 or GM-RL 3),**

or

If the agricultural collector / primary collector **is categorised at risk level 2 or 3 (C-RL 2 or C-RL 3):**

The agricultural collector / primary collector shall operate a documented in-house QM system establishing standard operating procedures to prevent GM contamination (incorporated into the HACCP system) throughout the company and including, at the least, the following elements:

- process chart including all details such as the conveying paths;
- determination of the critical control points with respect to the GM risk (identify, manage, verify);
- documentation of internal inspections.

## 7.2 Rapid tests / PCR tests after delivery / in the warehouse:

If the primary collector is **located in a GM risk level 2 (GM-RL2) production area (Romania excepted)**,

or

if the primary collector **accepts produce from GM risk level 2 (GM-RL2) production areas (Romania excepted)**,

or

if the primary collector is categorised at risk level 2 or 3 (C-RL 2 or C-RL 3):

Once taking into storage is completed, the collector shall conduct, at the least, one rapid GM test (Roundup Ready) on each storage unit and per 100 tonnes respectively. A positive rapid test result shall entail two further rapid GM tests. If any two of the three rapid tests conducted give a positive result, the collector shall have a PCR test performed.

If the PCR test detects the presence of GM content: The collector shall inform their contracted certification body of the result and, at the same time, send the relevant lot certificate to this certification body. Afterwards, the collector shall take the appropriate measures (root cause analysis and/or marketing ban).

Please note: Sampling and storage shall be in accordance with the customs of the Agricultural Products Exchange in Vienna (Börse für landwirtschaftliche Produkte in Wien) or with the GAFTA Sampling Rules No. 124 (chapter 3 „General“, chapter 4 „Method of Drawing Samples“, chapter 5 „Sample Labels“).

## 7.3 Rapid tests / PCR tests on delivery:

If the primary collector is **located in a production area of GM-risk level 3 (GM-RL 3) or in Romania**

or

if the primary collector **accepts produce from GM-risk level 3 production areas (GM-RL 3) or from Romania:**

Before the produce is accepted and taken into storage, the collector shall conduct at least one rapid GM test (Roundup Ready) on each delivery unit and at least once per 100 tonnes respectively. A positive rapid test result shall entail two further rapid GM tests. If any two of the three rapid tests conducted give a positive result, the collector shall have a PCR test performed.

If the PCR test detects the presence of GM content: The collector shall inform their contracted certification body of the result and, at the same time, send the relevant information (e.g. Declaration of Self-Commitment - Farmers) to this certification body. Afterwards, the collector shall take the appropriate measures (root cause analysis and/or marketing ban).

Please note: Sampling and storage shall be in accordance with the customs of the Agricultural Products Exchange in Vienna (Börse für landwirtschaftliche Produkte in Wien) or with the

GAFTA Sampling Rules No. 124 (chapter 3 „General“, chapter 4 „Method of Drawing Samples“, chapter 5 „Sample Labels“).

#### 7.4 Physical and technical separation:

**If the agricultural collector/primary collector is located in a production area of GM-risk level 3 (GM-RL 3),**

or

**if the agricultural collector/primary collector accepts produce from production area of GM-risk level 3 (GM-RL 3),**

or

**if the agricultural collector/primary collector is categorised at risk level 2 or 3 (C-RL 2 or C-RL 3):**

The different soybean qualities shall be separated both physically and technically. If only chronological separation is possible a duly justified explanation shall be available.

### 8 Directly commissioned inspections

8.1 The agricultural collector/primary collector shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections at the following frequency:

- collectors of all risk levels: first inspection;
- collectors of risk levels 0 to 2 (C-RL 0–2): further inspections every two years;
- collectors of risk level 3 (C-RL 3): further inspections once a year.

If the collector complies with the stated requirements, they shall be certified as a Donau Soja agricultural collector.

Primary collectors in production areas of GM-risk level 2 or 3 (GM-RL 2, GM-RL 3) need to be initially certified before the (harvested) soybeans are taken into storage.

8.2 All other collectors may be initially certified at a later date; however, in any case the initial certification has to be conducted before the first Donau Soja lot is sold. The directly commissioned certification body shall take a composite sample of the Donau Soja soya from the entire company within the scope of their Donau Soja audit, and shall submit this sample for a PCR test.

8.3 **If the primary collector is located in production areas with pesticide risk level 2 (PESTICIDE-RL 2):**

The directly commissioned certification body shall take a composite sample of the Donau Soja soya from the entire company each year following the harvest and shall submit this sample for a pesticide residue analysis.

8.4 If the certified agricultural collector/primary collector suspends or terminates their Donau Soja activity, Donau Soja Organisation may, at the expense of the agricultural collector, 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 with the directly commissioned certification body.

## **9 Supervisory inspections**

- 9.1 The agricultural collector/primary collector shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.

## **10 Special forms of primary collection**

The primary collection of Donau Soja soybeans shall usually be undertaken by agricultural collectors who, on the one hand, receive Donau Soja Declarations of Self-Commitment from the farmers (soybean producers), document them and check them for plausibility and, on the other hand, launch the process of lot certification with the aid of their respective certification body.

Alternatively, the soybean farmers (producers) may deliver their Donau Soja soybeans directly to a primary processor. In this case, this primary processor shall act as the primary collector (see paragraph 10.1).

Soybean farmers (producers), located in a production area of risk level 2 or 3 (F-RL 2 or F-RL 3), shall assume the primary collector's function if they sell their Donau Soja harvest directly to a trader. In this case, the soybean farmer needs to be certified as a primary collector and may only sell Donau Soja soybeans by means of Donau Soja lot certificates (see paragraph 10.2).

### **10.1 Soybean primary processor acting as a primary collector**

- 10.1.1 A soybean primary processor shall be considered a primary collector of Donau Soja soybeans if a soybean farmer (producer) sells and delivers the Donau Soja soybeans directly to this soybean primary processor and therefore needs to be certified as a primary collector.
- 10.1.2 In this case, the soybean primary processor shall assume the obligations laid down in paragraphs 2, 3, 6, 7, 8, 9 and 11 of the Requirements R 02 for Agricultural Collectors.
- 10.1.3 Issuance of lot certificates (in accordance with paragraphs 4 and 5) may be waived. However, the soybean primary processor has to ensure internally that the produce entering and leaving "storage capacity" unit as well as the produce entering and leaving the "processing" unit are documented separately and verifiably. The directly commissioned certification body shall inspect the area of internally separated documentation of the flow of produce during the first inspection.

### **10.2 Soybean farmer (producer) acting as a primary collector**

The following shall apply to soybean farmers (producers) located in a risk level 2 or 3 production area (F-RL 2 or F-RL 3):

- 10.2.1 A soybean farmer (producer) shall become primary collector if they sell their Donau Soja harvest directly to a trader.
- 10.2.2 In this case, the soybean farmer needs to be certified. The directly commissioned certification body shall verify compliance with the Requirements R 01 for Soybean Farmers as well as compliance with the spirit of the Requirements R 02 for Agricultural Soybean Collectors (particularly paragraph 3.1 and, where applicable, paragraph 7 of the Requirements R 02 – avoidance of mixing Donau Soja soya with other soya qualities during storage) within the scope of their audit. The soybean farmer shall also accept supervisory inspections as described in paragraph 9.
- 10.2.3 Issuance of lot certificates shall be carried out, mutatis mutandis, in accordance with paragraphs 3.2 (harvest declarations), 4.1 and 4.2 (acquisition of lot certificates), 5 (outgoing soybean deliveries), and 6 (stock management).
- 10.2.4 Directly commissioned inspections shall be performed in accordance with paragraphs 8.1 and 8.2.

## **11 Group certification**

- 11.1 Agricultural collectors and primary collectors have the option of applying for a group certification under the conditions as set out in "Requirements for Group Certifications" paragraph 2.
- 11.2 Primary collectors located in a production area of risk level 0-2 (F-RL 0 or F-RL 1 or F-RL 2) shall be responsible for group certification of the farmers delivering to collector as set out in "Requirements for Group Certifications" paragraph 3.

## **12 Miscellaneous**

- 12.1 Upon written application to Donau Soja: raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative scheme that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements may also be accepted and stored as Donau Soja. The soybeans must be sourced from the Donau Soja region as per point 1.1 of R01b. Additional requirements as per Annex 08 apply.



## REQUIREMENTS 03, Version 11

# Soya Trader

Purpose	Specify the requirements to be met by Donau Soja soya traders.
Definition	Soya trader: company buying and selling soybeans or soya products and/or products containing or consisting of soybeans (e.g. compound feed)
Outline	1 Risk assessment..... 1 2 Purchasing and selling soybeans and products, lot certification ..... 1 3 Directly commissioned inspections..... 3 4 Supervisory inspections ..... 3 5 Traders also acting as agricultural collectors ..... 3 6 Special case ..... 3 7 Direct purchases of traders, not acting as agricultural collectors, from soybean farmers (producers)..... 4 8 Miscellaneous..... 4
Status	Version 11: released by the Board on 18.12.2025

## 1 Risk assessment

- 1.1 The soya trader shall be assigned a "trader risk level" (= T-RL) based on the soybeans/products bought and sold by them.
- T-RL 0: soya trade with Donau Soja soya only;
  - T-RL 1: soya trade with GM-free soya only, but GM-free soybeans/products other than Donau Soja soya are possible;
  - T-RL 2: is not defined since the produce is not physically moved at this level (and the trade with crops other than soya is therefore not relevant);
  - T-RL 3: soya trade with GM soya and GM soybean meal is also possible.

## 2 Purchasing and selling soybeans and products, lot certification

- 2.1 The trader may only buy and sell Donau Soja soybeans/products if these are referred to as "Donau Soja soya", "Donau Soja" or "DS soya" on all invoices and delivery notes.
- 2.2 The trader may only buy and sell Donau Soja unprocessed soybeans if a lot certificate in the form of a signed (PDF) document is handed over to the trader for these soybeans. This lot certificate shall include the following information:
- name, postal and e-mail address of the seller;
  - name, postal and e-mail address of the buyer;
  - code of the certification body;
  - code of the lot certificate;
  - quantity of the soybean lot certified as Donau Soja;
  - harvest year;
  - reference number of accompanying documents (e.g. contracts, delivery notes);
  - "Donau Soja" logo.

A lot certificate is needed only for trading in unprocessed soybeans.

In case processed soya products are imported to or exported from the EU market:

A traceability certificate is optional for the placing on the market and trading with processed Donau Soja certified products. This traceability certificate shall comply with paragraph 2.2 of the Requirements for the Soya Trader (R03) as well as with the Requirements for the Traceability System.

2.3 For selling Donau Soja soya, the trader shall send a lot/traceability certificate request to their certification body. Each request shall include the following information:

- name and contact information of the buyer;
- where applicable, codes of the lot/traceability certificates related to the quantity of Donau Soja soya to be sold;
- type, trade name and quantity of the soybean/product to be sold as Donau Soja soya or to be delivered to the buyer;
- harvest year;
- reference number of accompanying documents (e.g. contracts, delivery notes).

2.4 The trader shall accept as response from their certification body the lot/traceability certificate in the form of a signed PDF document. The lot/traceability certificate shall include the following information:

- name, postal and e-mail address of the seller;
- name, postal and e-mail address of the buyer;
- code of the certification body;
- code of the lot/traceability certificate;
- quantity of the soybean lot/product unit certified as Donau Soja;
- harvest year;
- reference number of accompanying documents (e.g. contracts, delivery notes);
- "Donau Soja" logo.

Additionally, if available, data on the geolocation<sup>1</sup> of the plots of land on which the soybeans were produced can be provided on request.

2.5 The trader shall document the following information on all purchases and sales of soybeans/products and shall keep the documentation for at least 5 years from the date the soybeans/products were placed on the market or exported:

- names, postal and e-mail addresses and, where applicable, EU registration numbers (or equivalent specifications in non-EU countries) of all suppliers and customers;
- lot, trade name and type, quantity, quality label "Donau Soja", and lot/traceability certificates;
- country of origin
- the geolocation of all plots of land on which the soybeans, that the relevant product contains or has been made from, were produced;<sup>1</sup>

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<sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.

- harvest year;
- delivery date, carrier and receiver.

### **3 Directly commissioned inspections**

- 3.1 The trader shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections at the following frequency:
- traders of all risk levels: first inspection;
  - traders of risk levels 0 and 1 (T-RL 0 and 1): additional inspection every two years;
  - traders of risk level 3 (T-RL 3): additional annual inspection.
- 3.2 If the certified trader suspends or terminates their Donau Soja activity, Donau Soja Organisation may, at the expense of the trader, 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.

### **4 Supervisory inspections**

- 4.1 The trader shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.

### **5 Traders also acting as agricultural collectors**

- 5.1 If the trader stores products produced with or from Donau Soja soybeans:  
The trader shall ensure that Donau Soja soya products are not mixed with soya products of other qualities.
- 5.2 If the trader stores Donau Soja soybeans:  
The trader needs to be certified as an agricultural collector in compliance with the Requirements R 02.

### **6 Special case**

#### **Transfer/imposition of responsibilities of an agricultural collector to/on a trader**

- 6.1 If a trader exclusively buys Donau Soja soybeans from an agricultural collector or a primary collector, they may assume specific, precisely defined obligations of this collector.
- 6.2 Particularly, the responsibility for buying produce in compliance with Donau Soja (with Declarations of Self-Commitment – Farmers (Soybean Producers) and plausibility check), checking of incoming produce (including retained samples), handling the

quality management on site (paragraph 7 of R 02), as well as taking and storing retained samples in the outgoing produce department (paragraph 5.3 of R 02) may not be transferred.

- 6.3 If a trader exclusively uses one agricultural collector, this trader may commission external inspections (paragraph 8 of R 02 and paragraph 3 of the Requirements for Group Certifications) as well as the organisation and processing of lot certificates. In this case, the agricultural collector shall not be in possession of a certificate.

## **7 Direct purchases of traders, not acting as agricultural collectors, from soybean farmers (producers)**

- 7.1 If a trader buys Donau Soja soybeans directly from a soybean farmer (producer) located in a production area of risk level 0 or 1 (F-RL 0 or F-RL 1), without taking these beans into storage, this trader shall be considered a direct purchaser of Donau Soja soybeans.
- 7.2 In this case, the trader shall assume the obligations laid down in paragraph 2.1 (accepting produce from farmer and obtaining Declarations of Self-Commitment; list of delivering farmers), paragraph 2.4 (documentation of soybean suppliers), paragraph 2.5 (plausibility check), paragraph 3.2 (harvest declarations) and paragraph 4 (acquisition of lot certificates) and paragraph 11.2. (group certification of farmers) of the Requirements 02, as well as in paragraph 3 of the Requirements for Group Certifications. The obligations laid down in paragraph 2.5 (retained samples), paragraph 3.1 (correct storage) and paragraph 7 (quality management) of the Requirements R 02 shall remain with the primary agricultural collector.

## **8 Miscellaneous**

- 8.1 Upon written application to Donau Soja: Under certain circumstances, raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative system that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements may also be accepted and traded as Donau Soja. The soybeans must be sourced from the Donau Soja region as per point 1.1 of R01b. Additional requirements as per Annex 08 apply.

## Soybean Primary Processor

Purpose	Specify the requirements to be met by Donau Soja soybean primary processors.
Definition	<p><u>Primary processor</u>: first company substantially processing and/or treating raw soybeans chemically or physically, such as:</p> <ul style="list-style-type: none"> <li>- oil mill;</li> <li>- toaster;</li> <li>- soybean primary processors acting as food producers (e.g. tofu);</li> <li>- producer of food ingredients and food additives (e.g. lecithins, soy protein concentrate) produced directly or as secondary products derived downstream from raw soybean processing within the same company<sup>1</sup>.</li> </ul>
Outline	<p>1 Risk assessment..... 1</p> <p>2 Incoming deliveries of Donau Soja soybeans ..... 2</p> <p>3 Outgoing deliveries of Donau Soja soybeans ..... 4</p> <p>4 Soya stock management ..... 5</p> <p>5 Quality management ..... 6</p> <p>6 Product labelling ..... 7</p> <p>7 Donau Soja contract soybean primary processor..... 7</p> <p>8 Directly commissioned inspections ..... 7</p> <p>9 Supervisory inspections..... 8</p> <p>10 Special form: own-use soybean primary processor ..... 8</p> <p>11 Special case ..... 9</p> <p>12 Miscellaneous..... 10</p>
Status	Version 15: released by the Board on 18.12.2025

### 1 Risk assessment

1.1 The primary processor shall be assigned a “primary processor risk level” (= P-RL) based on the quality of the soybeans delivered to the primary processor and processed there:

- P-RL 0: only Donau Soja soybeans are processed;
- P-RL 1: other GM-free soybeans (documented as being GM-free) are also processed;
- P-RL 2: other GM crops (except for soybeans) may also be processed (e.g. maize from countries of risk level 2 or 3);
- P-RL 3: option limited to **oil mills and toasters**, not possible for food producers:

If the processing lines are 100 % separated, both physically and technically, GM soya may also be present at the same site.

<sup>1</sup> For secondary products not directly derived from raw soybeans, no additional license fee is payable. However, the list of customers should be notified to Donau Soja Organisation (see 2.6.).

In particular cases, the Board of Donau Soja Association may temporarily approve chronological segregation between the processing of GM soybeans and the processing of GM-free soybeans (= dual processing).

Approval of dual processing is conditional on the following steps:

- The oil mill/toaster shall submit in writing a duly justified application for approval to Donau Soja Association.
- Donau Soja Association shall commission a chargeable audit in order to verify that chronological segregation does not pose an increased risk of GM-free soya being mixed with GM soya.
- The Board shall, when taking a decision, take into account any recommendations provided by audit bodies. The Board shall also limit the duration of the approval granted to the oil mill/toaster to one year. Additional conditions for obtaining the approval, such as an increased frequency of analyses (rapid tests, PCR testing), may be imposed on the oil mill/toaster.
- The oil mill/toaster shall demonstrate compliance with the spirit of all requirements as stipulated in the Requirements R 05 (for Compound Feed Producers) for dual processing, particularly with regard to the risk analysis (document) mentioned in paragraph 4.6 and the carry-over analysis mentioned in paragraph 4.7.
- The oil mill/toaster shall verify the correct functioning of chronological segregation by conducting rapid GM tests (Roundup Ready) on the first three truck deliveries of the first Donau Soja lot following the production conversion. The oil mill/toaster shall also document the results of these tests.
- If any condition of approval is violated, any approval that has been granted may be withdrawn at any time.

For **food producers**:

No P-RL 3 possible as no GM soybeans may be processed at the entire site.

## **2 Incoming deliveries of Donau Soja soybeans**

- 2.1 All incoming soybeans shall be purchased from Donau Soja certified companies, be Donau Soja certified and be accompanied by a valid lot certificate.
- 2.2 Before accepting delivery, the primary processor shall take one sample of each transport unit (e.g. truck) and per 100 tonnes respectively. The sample shall be divided for the following purposes:
  - retained sample, which shall be stored for at least one year safely and without influencing its quality, ensuring traceability;
  - rapid tests (Roundup Ready) and, where applicable, further testing (see 2.2).

Please note: Sampling and storage shall be in accordance with the customs of the Agricultural Products Exchange in Vienna (Börse für landwirtschaftliche Produkte in Wien) or with the GAFTA Sampling Rules No. 124 (chapter 3 „General“, chapter 4 „Method of Drawing Samples“, chapter 5 „Sample Labels“).

2.3 The primary processor shall conduct an approved rapid GM test (Roundup Ready) on all samples taken for this purpose and referred to in paragraph 2.1 above. Afterwards, and depending on the test result, the primary processor shall implement the following measures:

- If the 1<sup>st</sup> rapid test does not detect any GM content: The primary processor shall accept the corresponding soybean lot.
- If the 1<sup>st</sup> rapid test detects the presence of GM content: The primary processor shall subject the sample to two further rapid tests.
- If neither the 2<sup>nd</sup> nor the 3<sup>rd</sup> rapid test detects any GM content: The primary processor shall accept the corresponding soybean lot.
- If the 2<sup>nd</sup> or 3<sup>rd</sup> rapid test detects the presence of GM content: The primary processor shall either not accept the corresponding soybean lot or shall store the lot separately. In addition, the primary processor shall have a PCR test performed at a laboratory accredited for this test procedure in accordance with ISO standard 17025.
- If the PCR test detects a GM content of less than 0.9 %: The primary processor shall inform their contracted certification body of the result, and send the relevant lot certificate to this certification body. Afterwards, the primary processor shall take the appropriate measures (root cause analysis).
- If the PCR test detects a GM content of 0.9 % or more: The primary processor shall inform their contracted certification body of the result (and send the relevant lot certificate to this certification body). Afterwards, the primary processor shall take the appropriate measures. The primary processor shall remove the soya lot with a GM content of 0.9 % or more from the flow of produce and shall **not** market this lot as Donau Soja.

2.4 Depending on the risk assessment (see Annex 04), further testing may be required:

The following shall apply to Donau Soja soybeans produced in production areas of GM risk level 2 (GM-RL 2, i.e. the cultivation of GM maize is possible): If the unwanted maize content in any soybean lot exceeds the maximum level of 0.5 %, the corresponding sample shall be additionally analysed for approved GM maize varieties using rapid tests (Roundup Ready).

- If the 1<sup>st</sup> rapid test does not detect any GM content: The primary processor shall accept the corresponding soybean lot.
- If the 1<sup>st</sup> rapid test detects the presence of GM content: The primary processor shall subject the sample to two further rapid tests.
- If neither the 2<sup>nd</sup> nor the 3<sup>rd</sup> rapid test detects any GM content: The primary processor shall accept the corresponding soybean lot.
- If the 2<sup>nd</sup> or 3<sup>rd</sup> rapid test also gives a positive result, the primary processor shall have a PCR test performed at a laboratory accredited for this test procedure in accordance with ISO standard 17025.
- If the PCR test detects a GM content of less than 0.9 %, the primary processor shall conduct a root cause analysis together with **their own** certification body in order to determine whether the contamination occurred accidentally and/or was technically unavoidable.



- If the PCR test detects a GM content of 0.9 % or more, the primary processor shall remove the lot concerned from the flow of produce and shall **not** market this lot as Donau Soja.

2.5 The primary processor shall document the following for all incoming deliveries of Donau Soja soybeans:

- names, addresses and, where applicable, EU registration numbers (or equivalent specifications in non-EU countries) of all suppliers;
- results of rapid tests (Roundup Ready) and, where applicable, of PCR testing;
- lot, quantity, quality label "Donau Soja", and lot certificates;
- delivery date, carrier and receiver;
- transfer cell.

If the primary processor accepts Donau Soja soybeans directly from the soybean farmer:

The primary processor shall document the Declarations of Self-Commitment – Farmers (Soybean Producers) for all incoming deliveries. The primary processor shall comply with all requirements laid down in R02, paragraph 10.1 ("Soybean primary processor acting as a primary collector").

2.6 By the 10<sup>th</sup> of each calendar month, the primary processor shall send the following information unprompted to Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)), forwarding a copy of this information to the primary processor's contracted certification body:

- the quantity of Donau Soja soybeans (in tonnes) effectively delivered to the primary processor and processed there in the previous month, with reference to relevant lot certificates;
- the quantity of processed Donau Soja soya invoiced and/or internally used in the previous month (all marketed Donau Soja products such as meal, oil-cake, oil, or food, plus customer names).

Please note: Licence fees / Certification fees shall be calculated based on the respective beans equivalent to the quantity of Donau Soja products invoiced and/or internally used; in case more than one Donau Soja product is used/invoiced, the licence fee / certification fee shall be incurred only once per beans equivalent.

### **3 Outgoing deliveries of Donau Soja soybeans**

3.1 The primary processor shall document the following for all outgoing deliveries of processed Donau Soja soya products:

- names, addresses and, where applicable, EU registration numbers (or equivalent specifications in non-EU countries) of all customers;
- lot, quantity, quality label "Donau Soja";
- delivery date, carrier and receiver;
- loading cell.

3.2 A traceability certificate is optional for the placing on the market and trading with processed Donau Soja certified products.

The seller shall send a traceability certificate request to their certification body. Each request shall include the following information:

- name and contact information of the buyer;
- where applicable, codes of the traceability certificates related to the quantity of Donau Soja soya to be sold;
- type, trade name and quantity of the soya /product to be sold as Donau Soja soya or to be delivered to the buyer;
- harvest year;
- reference number of accompanying documents (e.g. contracts, delivery notes);

The seller shall accept as response from their certification body the traceability certificate in the form of a signed PDF document. The traceability certificate shall include the following information:

- name, postal and e-mail address of the seller;
- name, postal and e-mail address of the buyer;
- code of the certification body;
- code of the traceability certificate;
- quantity of the soya product unit certified as Donau Soja;
- harvest year;
- reference number of accompanying documents (e.g. contracts, delivery notes)
- "Donau Soja" logo.

Additionally, if available, data on the geolocation<sup>2</sup> of the plots of land on which the soybeans were produced can be provided on request.

- 3.3 The primary processor shall take a retained sample of each lot of processed soya products delivered, and shall store this sample for at least one year safely and without influencing its quality.

Please note: Sampling and storage shall be in accordance with the customs of the Agricultural Products Exchange in Vienna (Börse für landwirtschaftliche Produkte in Wien) or with the GAFTA Sampling Rules No. 124 (chapter 3 „General“, chapter 4 „Method of Drawing Samples“, chapter 5 „Sample Labels“).

## **4 Soya stock management**

- 4.1 In the following cases, the primary processor shall send to their certification body and to Donau Soja Organisation quantity amendment notifications regarding the stock of Donau Soja soybeans, specifying the reason for the notification:
- carry-over: remaining stock from the previous harvest year (notification by 31 August of the current calendar year, otherwise these quantities in store shall no longer qualify as Donau Soja);

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<sup>2</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.

- deviation of quantities delivered to the primary processor: incoming deliveries deviating from contracted delivery quantities.

## 5 Quality management

5.1 The primary processor shall operate a documented in-house QA system establishing standard operating procedures to prevent GM contamination throughout the company (including incoming delivery, processing, storage, cleaning, transportation, packing, and outgoing delivery). The primary processor shall also apply a risk-based PCR sampling plan ensuring that GM contamination is detected.

5.2 If the primary processor is a risk level 3 company (P-RL 3):

The primary processor shall document that GM and non-GM produce is separated 100 %, both physically and technically. Documentation shall be consistent and cover all stages from incoming produce to outgoing produce. (Companies which have been granted a temporary approval of dual processing in accordance with paragraph 1.1 are exempted from this provision.)

5.3 If the primary processor is an oil mill or a toaster:

The primary processor shall, in the field of activity of "production of single feed material" be in possession of a certificate of one of the following QA systems:

- 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);
- EFISC (European Feed Ingredients Safety Certification);
- FCA (Feed Chain Alliance Standard); 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.

5.4 If the primary processor is an oil mill:

As for Salmonella monitoring, the primary processor shall apply the requirements for analysis according to the AMA-feedstuff monitoring Pastus+ (version 1 valid from January 2020; annex 1 to AMA-Feedstuff guideline pastus+ and pastus+ Regulation for Small Quantities):

Number of analysis to be performed per year and operating site:

Production in t Substance	<1000	≥1.000- <3.000	≥3.000- <5.000	≥5.000- <10.000	≥10.000- <100.000	≥100.000- <300.000	≥300.000
Salmonella	4	6	8	12	50	90	180

No strains of Salmonella are permissible.

In case of a positive finding (self-monitoring or external sampling), the required salmonella analyses need to be intensified for a period of three months, switching from a 1-fold approach to a 5-fold approach. If no positive result is obtained within that period, the 1-fold approach may be resumed.

- 5.5 If the primary processor wishes to market phospholipid mixtures as Donau Soja lecithins, the requirements detailed in Commission Regulation (EU) No 231/2012 for E 322 have to be complied with and compliance with these requirements has to be verified in any case.

## 6 Product labelling

- 6.1 The primary processor may label produce delivered (packaging) as "Donau Soja" if this produce is entirely (100 %) made up of Donau Soja soya products such as Donau Soja soybean meal or Donau Soja soybean oil.
- 6.2 In case of mixed products (containing both soya components and components other than soya), 100 % of the soya components shall be Donau Soja soya and all other product components shall also comply with the non-GM requirements.

## 7 Donau Soja contract soybean primary processor

- 7.1 The primary processor and Donau Soja Organisation shall conclude the Donau Soja primary processor contract on the requirements to be met by the primary processor.
- 7.2 The primary processor must hold a valid membership with the Donau Soja Association.

## 8 Directly commissioned inspections

- 8.1 The primary processor shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections at the following frequency:
- primary processors of all risk levels: first inspection;
  - primary processors of risk levels 0 and 1 (P-RL 0 and P-RL 1): additional annual inspection;
  - primary processors of risk levels 2 and 3 (P-RL 2 and P-RL 3): additional inspections twice a year (one unannounced inspection).

- 8.2 The directly commissioned certification body shall take a composite sample from the entire Donau Soja soya processing line within the scope of their Donau Soja audit, and shall submit this sample for a PCR test.<sup>3</sup>
- 8.3 If the certified primary processor suspends or terminates their Donau Soja activity, Donau Soja Organisation may, at the expense of the primary processor, 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.

## **9 Supervisory inspections**

- 9.1 The primary processor shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.

## **10 Special form: own-use soybean primary processor**

- 10.1 Agricultural processors mixing animal feed on their own holdings for feeding their own livestock shall be categorised as own-use primary processors and shall not be considered as compound feed producers. Acting as own-use soybean primary processors, these operations may process own-harvested or purchased Donau Soja soybeans in a separate facility – solely for the purpose of feeding the livestock on their own holdings. Own-use soybean primary processors may neither deal in Donau Soja soybeans (raw or processed) nor process them as a subcontractor.

The marketing of small quantities of the main product (such as soybean cake) or of small quantities of by-products resulting from the own-use soybean primary processor's own processing (such as soybean oil or soybean hulls) as Donau Soja produce will be approved on a case-by-case basis on application and following examination by Donau Soja Organisation.

- 10.2 For own-use soybean primary processors, all Requirements R 04 (for Soybean Primary Processors) shall apply, with the following simplifications:
- Paragraph 2: Rapid GMO tests may be omitted for a farm in countries with risk levels (P-RS) 0-1, provided that the soybeans originate from countries with risk levels (P-RS) 0-1.
  - Paragraph 2.5 (quantity notifications): Monthly notifications of quantities of Donau Soja soybeans may be substituted by quarterly or annual notifications.
  - Paragraph 3 (outgoing deliveries of processed Donau Soja products): For outgoing deliveries of processed Donau Soja soya products, the documentation of outgoing deliveries as well as the taking and storing of retained samples is waived. The company shall document the quantities used for feeding their livestock, including the date and the lot certificate (in case of purchased soybeans).

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<sup>3</sup> PCR tests may only be conducted for soybeans or protein-containing soya products. Soybean oil is not relevant for PCR analysis.

- Paragraph 5.3 (quality management/quality certification): The company may apply for a simplified QA certification. In Austria, the AMA Gütesiegel<sup>4</sup> home feed compounder certification with an additional checklist for own-use toasters is recognised as being equivalent to the QA certifications mentioned in paragraph 5.3.
- Paragraph 8.1: The inspection of the own-use primary processing operation should be carried out as part of the Donau Soja inspection of the agricultural processor (A06a) at least every 3 years.

## 11 Special case

### **Transfer/imposition of responsibilities of a soybean primary processor to/on other participants in the Donau Soja system (traders in particular)**

- 11.1 Specific, precisely defined tasks of a primary processor may be transferred to participants in the Donau Soja system upstream or downstream of this primary processor, following approval by the Board of Donau Soja Association.
- 11.2 A) Particularly, the purchase of Donau Soja soybeans and the associated assurance of traceability, the availability of lot certificates and the imposition of all obligations on all upstream suppliers (as provided for in the Donau Soja Guidelines and Donau Soja contracts) may be transferred by a primary processor to a trader, for instance, who will, on the one hand, organise the purchase of the Donau Soja soybeans for this primary processor and, on the other hand, buy the processed Donau Soja soybeans (e.g. Donau Soja meal) as outgoing produce from this primary processor.
- B) Specific tasks of the primary processor such as checking the incoming/outgoing produce, ensuring a QA system and a corresponding certification (paragraph 5), or conducting Salmonella analyses, may not be transferred to other participants in the Donau Soja system.
- 11.3 If a primary processor exclusively produces Donau Soja products for a third party (particularly a trader), the obligation to monthly report the quantities of Donau Soja soybeans and to pay the licence fee / certification fee (paragraph 2.5) may also be transferred. In this case, the inspection which is normally to be commissioned directly by the primary processor may also be commissioned by the trader – provided that the primary processor concerned is listed as an external production site in the inspection contract of this trader and is identified as such in the certificate. In this case, the primary processor does not receive his own certificate. In very exceptional cases and if expressly authorised by the Board of Donau Soja Association, paragraph 7 (contract between the primary processor and Donau Soja Organisation) may be waived if the contract between the primary processor and the trader clearly specifies that the primary processor shall fulfil at least the obligations detailed in paragraph 11.2 B).

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<sup>4</sup> AMA Gütesiegel is the quality label of Agrarmarkt Austria (AMA).

### **Transfer/imposition of responsibilities of a primary collector to/on a primary processor**

- 11.4 If a primary processor exclusively buys Donau Soja soybeans from one primary collector, they may assume specific, precisely defined obligations of this collector.
- 11.5 Particularly, the responsibility for buying produce in compliance with the Donau Soja requirements (with Declarations of Self-Commitment – Farmers [Soybean Producers] and a plausibility check), checking of incoming produce (including retained samples), handling the quality management on site (paragraph 7 of R 02), as well as taking and storing retained samples in the outgoing produce department (paragraph 5.3 of R 02) shall not be transferable.
- 11.6 If a primary processor exclusively uses one primary collector, this primary processor may commission external inspections (paragraph 8 of R 02 and paragraph 3 of the Requirements for Group Certifications) as well as the organisation and processing of lot certificates. In this case, the primary collector shall not receive their own certificate.

## **12 Miscellaneous**

- 12.1 Special case: In the event of critical supply shortages of certified Donau Soja soybeans, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya soybeans instead. A written request stating the grounds for the application must be sent to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The primary processor is obligated to report the quantity of Europe Soya (ES) materials used to produce Donau Soja (DS) soya products to the Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)) and their DS certification body on a yearly basis, as well as the total amount of DS soya used in this timeframe.
- 12.2 Upon written application to Donau Soja: raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative system that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements may also be accepted and processed as Donau Soja. The soybeans must be sourced from the Donau Soja region as per point 1.1 of R01b. Additional requirements as per Annex 08 apply.



# Compound Feed Producer

Purpose	Specify the Donau Soja requirements to be met by producers of compound feed and other materials intended as feed (lecithin, soy protein concentrate etc.).
Definition	<p><u>Compound feed producer</u>: company producing ready-made feed material or complementary feed material by mixing single feed materials.</p> <p>The manufacture of other feed materials (e.g. lecithin or soy protein concentrate) that is <u>not</u> produced from raw soybeans in the same company and is <u>intended for animal feed</u> is also covered by this document.</p> <p><b>Non-GM (produce)</b>: non-genetically modified (produced without GMOs)  <b>GM (produce)</b>: genetically modified (produced with GMOs)</p>
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 Donau Soja contract compound feed producer..... 6</p> <p>11 Directly commissioned inspections ..... 6</p> <p>12 Supervisory inspections ..... 6</p> <p>13 Miscellaneous ..... 6</p>
Status	Version 09: released by the Board on 18.12.2025

## 1 Donau Soja definition of compound feed producer

- 1.1 According to the definition by Donau Soja Organisation, compound feed producers are not primary processors because, as a rule, these producers do not use unprocessed soybeans. 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 All incoming soybean products intended for production of Donau Soja feed shall be purchased from Donau Soja certified companies and be Donau Soja certified. A certificate of traceability (COT) to accompany the goods is voluntary.
- 2.2 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 soybeans, maize and rapeseed).

2.3 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.

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

- detailed information about suppliers, the quantity and the product name (Donau Soja where applicable);
- supplier contracts and framework agreements shall not suggest that the raw material is a GM product, and shall include the Donau Soja 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 Donau Soja Auslobung"/"suitable for the production of GM-free food labelled as Donau Soja" or which is labelled as "Donau Soja", the total amount of soya has to be Donau Soja 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 Organisation.

3.2 In the production of animal feed, the specified minimum percentage of soya for the respective animal species shall be taken into account (see requirements A 06a, point 4.3).

3.3 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 Donau Soja Auslobung"/"suitable for the production of GM-free food labelled as Donau Soja", such mark pointing out that the relevant animal feed is suitable for the production of animal products labelled as "fed with Donau Soja".

6.3 Single feed material (packaging) may be labelled as "Donau Soja" if this produce is entirely (100%) made up of Donau Soja soya or a processed Donau Soja soya product such as soybean meal.

6.4 Compound feed (packaging) containing soya or a processed soya product such as soybean meal may also be labelled as "Donau Soja" if 100 % of the soya components is Donau Soja 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 Donau Soja 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);
  - FCA (Feed Chain Alliance Standard); 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 Donau Soja contract compound feed producer**

- 10.1 The compound feed producer and Donau Soja Organisation shall conclude the Donau Soja compound feed producer contract on the requirements to be met by the compound feed producer.
- 10.2 The compound feed producer must hold a valid membership with of the Donau Soja Association.

## **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 Donau Soja soya from the entire company within the scope of their Donau Soja audit, and shall submit this sample for a PCR test.
- 11.3 Whenever possible, Donau Soja audits and certifications shall always be conducted together and in combination with non-GM inspections. If this is not possible, the Donau Soja 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 Donau Soja 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.

## **13 Miscellaneous**

- 13.1 Special case: in the event of critical supply shortages of certified Donau Soja materials, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya materials instead. A written request stating the grounds for the application must be sent to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating



these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The compound feed producer is obligated to report the quantity of Europe Soya (ES) materials used to produce Donau Soja (DS) feed materials to the Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)) and their DS certification body on a yearly basis, as well as the total amount of DS soya used in this timeframe.



## REQUIREMENTS 06a, Version 05

# Agricultural Processor

Purpose	Specify the Donau Soja requirements to be met by agricultural processors (animal keepers).
Definition	<p>Agricultural processor: Company or agricultural holding engaged in animal husbandry and feeding soya-containing single or compound feed to their animals (e.g. farms, where laying hens, fattening poultry, fattening pigs, beef cattle or dairy cattle are kept.)</p> <p><b>Non-GM:</b> non-genetically modified  <b>GM:</b> genetically modified  <b>GMO:</b> genetically modified organism  <b>Codex:</b> Guideline on the Definition of "GMO-Free Production" of Food and its Labelling (<i>Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung</i>) published in the Austrian Food Codex (Codex Alimentarius Austriacus)<sup>1</sup> in combination with its Guideline on the Risk-Based Monitoring of GMO-Free Production (<i>Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit</i>)<sup>2</sup>  <b>VLOG:</b> German „Verband Lebensmittel ohne Gentechnik“ (VLOG, <a href="http://www.ohnegentechnik.org">www.ohnegentechnik.org</a>)  <b>Non-GM Danube Region Standard</b><sup>3</sup></p>
Outline	<p>1 Risk assessment ..... 1  2 Incoming produce with declaration..... 2  3 Documentation and record keeping ..... 2  4 Outgoing produce, product labelling..... 3  5 Donau Soja License Contract ..... 4  6 Directly commissioned inspections ..... 4  7 Supervisory inspections ..... 5  8 Group certification..... 5  9 Miscellaneous..... 5</p>
Status	Version 05: this version was released by the Board on 18.12.2025

## 1 Risk assessment

### 1.1 Presence of GM animal feed

The animal keeper shall be assigned an "animal keeper risk level" (= A-RL) based on the qualities of the soya delivered to the company and stored and fed to the animals there:

<sup>1</sup> 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](http://www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn)

<sup>2</sup> Reference for the *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](http://www.bmfwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf)

<sup>3</sup> Reference for the Non-GM Danube Region Standard and Inspection Standard: [www.donausoja.org/en/downloads](http://www.donausoja.org/en/downloads)

- A-RL 0: Donau Soja soya single or compound feed only;
- A-RL 1: also other non-GM soya single or compound feed (non-GM is documented);
- A-RL 2: also GM single or compound feed, but only in another farm activity (e.g. certified laying hen feed & conventional fattening pig feed), no GM feed or raw materials in the same facilities;
- A-RL 3: also GM single or compound feed in the same facilities, but only if appropriate measures to minimise the GMO contamination risk are taken.

## **2 Incoming produce with declaration**

2.1 All incoming feed intended for Donau Soja production shall be purchased from Donau Soja certified companies and be Donau Soja certified.

2.2 Soya-containing animal feed

The type and quantity of single or compound feed, premixtures, additives and (processing) aids purchased and used shall be consistently documented using appropriate accompanying shipping documents (delivery notes, invoices), including the complete and correct quality label "Donau Soja", and shall be open to inspection.

2.3 Animal feed

In compound feed (containing also non-soya components), 100 % of the soya components shall be Donau Soja soya. All feed components shall comply with the non-GM requirements (e.g. maize, rapeseed or premixtures).

A valid Donau Soja certificate from each supplying single or compound feed producer shall be open to inspection.

## **3 Documentation and record keeping**

3.1 The number and density of livestock, along with the date of their entry and exit, shall be documented in a way that a plausibility check on the animal feed used (e.g. feed ration per day or per fattening period) can be done immediately and at any time.

3.2 A list of animal feed and suppliers as well as a list of customers shall be available and open to inspection.

3.3 Internal documentation of animal feed use shall enable a plausibility check to be made on the matching of the Donau Soja quantities used with the quantity of products produced therewith and with the number of livestock.

3.4 In case of home feed compounders and mobile blenders at the company: The use of compliant animal feed, premixtures, additives and (processing) aids shall be appropriately documented so that a plausibility check on the animal feed used can be done immediately and at any time.

3.5 Animal keepers utilising mobile blenders shall ensure that these blenders have been appropriately cleaned so that they are empty, clean and free of any GMO traces before they come into contact with Donau Soja products.

3.6 In case of direct marketers: The animal keeper shall conclude a Donau Soja Licence Contract with Donau Soja Organisation on the requirements to be met.

#### 4 Outgoing produce, product labelling

- 4.1 The quality and quantity of Donau Soja produce as well as their buyers shall be precisely documented in the outgoing produce department.
- 4.2 The produce itself (packaging) as well as the accompanying shipping documents (delivery notes, invoices) shall bear a mark stating "fed with Donau Soja".
- 4.3 Minimum percentages of soya

The product name "fed with Donau Soja" may only be used if the following two criteria are met:

- In products that consist of soya, contain soya (components) or were produced using soybeans as animal feed (incl. soya components such as oil added to the animal feed), the total amount of soya has to be Donau Soja soya.

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 Organisation.

- In the production of animal products, the entire feed ration shall have the following minimum percentages of soya:

Animal species	Minimum percentage of soya
Fattening pigs	5 %
Fattening poultry	10 %
Laying hens	5 %*
Beef cattle	250 g/animal/day
Dairy cows	100 g/animal/day**

\* calculated over the entire laying period of a flock

If an egg packing station (working with several egg suppliers) wishes to label their products as "Donau Soja", they have to make sure that at least 80 % of the certified eggs come from laying hens being fed on the aforementioned minimum amount of soya.

\*\* applicable for self-marketers of milk and milk products

If a dairy company (working with several milk suppliers) wishes to label their products as "Donau Soja", they have to make sure that at least 20 % of the milk comes from cows being fed on the aforementioned minimum amount of soya.

Lower minimum percentages of soya will be approved on a case-by-case basis on application and following examination by Donau Soja Organisation.

Home feed compounders shall comply with the required minimum percentage of soya in the feed ration (see table), and the total amount of soya has to be Donau Soja soya. Compliance with these requirements shall be demonstrated by formulations and mixing protocols.

#### 4.4 Conversion periods

Once the conversion of a herd to GM-free feeding in accordance with the Austrian Food Codex, or the requirements of the German *EG-Gentechnik-Durchführungsgesetz* (EC Genetic Engineering Implementation Act), or the Non-GM Danube Region Standard is completed, the product may be marked with the product name "fed with Donau Soja" immediately after the feeding was converted to Donau Soja soya on farms where laying hens or dairy cows are kept and which are converted for the first time.

In all other cases, the same conversion periods as for the "GMO-free" labelling in the Austrian Food Codex Guideline, or in the German *EG-Gentechnik-Durchführungsgesetz* (EC Genetic Engineering Implementation Act), or in the Non-GM Danube Region Standard shall apply to Donau Soja product labelling until a product can be placed on the market.

- 4.5 In case of direct marketers: The animal keeper may label produce delivered to a customer (packaging) as "fed with Donau Soja" provided that all requirements are met.

### 5 Donau Soja License Contract

- 5.1 Before marketing products with the Donau Soja logo to consumers, the company must become a member of the Donau Soja Association and conclude a Donau Soja license contract (for logo usage) with Donau Soja Organisation on the labelling requirements to be met. This includes the requirement to submit labels for review and approval to Donau Soja.

### 6 Directly commissioned inspections

- 6.1 The animal keeper shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections at the following frequency:
- animal keepers of all risk levels: first inspection;
  - animal keepers of risk levels 0 to 2 (A-RL 0-2): further inspections every two years;
  - animal keepers of risk level 3 (A-RL 3): additional inspection once a year.

Whenever possible, Donau Soja audits and certifications shall always be conducted together and in combination with non-GM inspections.

- 6.2 Donau Soja certifications and inspections only relate to those animal species the products of which are designated as "fed with Donau Soja". Other production lines do not need to be subject to the scope of testing provided that there is no risk of Donau Soja soya being mixed with other soya qualities.

Please note: Home feed compounders purchasing soybean meal, toasted soybeans or other soya components such as soybean oil are to be considered as farmers. Home feed compounders processing own-harvested or purchased soybeans in a separate facility for the purpose of feeding the livestock on their own holdings, are primary processors according to the Donau Soja Guidelines (see Requirements R 04 for Soybean Primary Processors).

- 6.3 If the certified animal keeper suspends or terminates their Donau Soja activity, Donau Soja Organisation may, at the expense of the animal keeper, 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.

## **7 Supervisory inspections**

- 7.1 The company shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.

## **8 Group certification**

- 8.1 Agricultural processors have the option of applying for a group certification under the conditions as set out in the Donau Soja "Requirements for Group Certifications".

## **9 Miscellaneous**

- 9.1 Special case: in the event of critical supply shortages of certified Donau Soja feed, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya feed instead. A written request stating the grounds for the application must be sent to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The agricultural processor is obligated to report the quantity of Europe Soya (ES) feed materials used to produce Donau Soja (DS) soya products to the Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)) and their DS certification body on a yearly basis, as well as the total amount of DS feed materials used in this timeframe.

## Food Processor through Marketer

Purpose	Specify the requirements to be met by producers of processed food products and semi-finished products as well as by food producers, food marketers and distributors of labelled products (logo users).
Definition	<p><b>Food processor:</b> Company processing products from animals fed with Donau Soja, or processing soya components and processed soya for food use (soybean primary processors acting as food producers—see Requirements R 04)</p> <p>This shall include, in particular, the following companies:</p> <ul style="list-style-type: none"> <li>- -producers of processed food products/semi-finished products (e.g. egg breaking plants, fresh egg processors, slaughterhouses, also e.g. production of lecithins and soy protein concentrate for food use)—this means products that are <u>not</u> intended for the final consumer;</li> <li>- -food producers, food marketers (e.g. egg packing stations, dairies, cutting plants, butcher's shops and soybean oil refineries or soya product producers, respectively, but also convenience food producers)— this means products that are intended for the <u>final consumer</u>;</li> <li>- -distributors of labelled products (logo users).</li> </ul> <p><b>GM:</b> genetically modified  <b>Non-GM:</b> non-genetically modified = GM-free</p>
Outline	<p>1 Incoming produce .....1</p> <p>2 Processing, storage and packing.....2</p> <p>3 Documentation and record keeping .....2</p> <p>4 Outgoing produce, product labelling.....2</p> <p>5 Quantitative flow monitoring .....3</p> <p>6 Donau Soja Contract.....3</p> <p>7 Directly commissioned inspections .....3</p> <p>8 Supervisory inspections .....4</p> <p>9 Miscellaneous.....4</p>
Status	Version 05: released by the Board on 18.12.2025

### 1 Incoming produce

- 1.1 All incoming soybean materials and components intended for production of Donau Soja products shall be purchased from Donau Soja certified companies and be Donau Soja certified.
- 1.2 The type and quantity of raw materials and components purchased and used shall be consistently documented using appropriate accompanying shipping documents (delivery notes, invoices), including the complete and correct quality label "Donau Soja", and shall be open to inspection.
- 1.3 A valid Donau Soja certificate from each supplying Donau Soja supplier shall be open to inspection.



- 1.4 All soya components or all animal products that were produced using soybeans as animal feed shall comply with the Donau Soja requirements. In addition, all components shall comply with the non-GM requirements.

## **2 Processing, storage and packing**

- 2.1 The certification body shall have access to and power of audit in all relevant areas of the processor's/marketer's premises.
- 2.2 Acceptance of produce, storage as well as the internal transportation of Donau Soja produce shall be segregated in either space or time from other produce not labelled as Donau Soja.
- 2.3 Use of equipment for processing Donau Soja produce shall be segregated in either space or time from other produce not labelled as Donau Soja.
- 2.4 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.
- 2.5 GM soybeans may not be processed or stored throughout the entire site.

## **3 Documentation and record keeping**

- 3.1 All staff in the areas of incoming produce, storage, processing, packing, transportation and outgoing produce have been appropriately trained in complying with relevant standard operating procedures.
- 3.2 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.
- 3.3 A complete list of raw materials and suppliers shall be available.
- 3.4 All certification-relevant formulations and/or lot records shall be available for quantitative flow calculation.
- 3.5 A product range list of certified Donau Soja products is available.
- 3.6 A complete list of customers, indicating which customers have received which lots, shall be available at any time.
- 3.7 Not only incoming and outgoing produce, but also stocks and produce entering or leaving storage premises shall be quantified and recorded.

## **4 Outgoing produce, product labelling**

- 4.1 The type and quantity of processed products as well as their buyers shall be precisely documented in the outgoing produce department.
- 4.2 The product name appearing on accompanying shipping documents (outgoing invoices or delivery notes) shall include "Donau Soja". In animal products, the product name shall include "fed with Donau Soja".
- 4.3 The registered brand "Donau Soja" or "fed with Donau Soja" may only be used if the following criteria are met:





- soya (components), products containing soya (components), and animal products that were produced using soybeans as animal feed component shall be of 100 % certified Donau Soja quality;  
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 Organisation.
- animal-based raw materials (e.g. meat, eggs, milk, ...) shall comply with the required minimum percentage of soybeans in the entire feed ration (see Requirements R 06a);  
If a dairy company (working with several milk suppliers) wishes to label their products as "Donau Soja", they have to make sure that at least 20 % of the milk comes from cows being fed on the minimum amount of soya (see Requirements R 06a).

## **5 Quantitative flow monitoring**

- 5.1 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.

## **6 Donau Soja Contract**

- 6.1 If products are being manufactured from raw soybeans (e.g. tofu), the food processor must get certified under the primary processor (R 04) scope and conclude the Donau Soja primary processor contract on the requirements to be met by the primary processor with Donau Soja Organisation.
- 6.2 Before marketing products with the Donau Soja logo to consumers, the company must become a member of the Donau Soja Association and conclude a Donau Soja license contract (for logo usage) with Donau Soja Organisation on the labelling requirements to be met. This includes the requirement to submit labels for review and approval to Donau Soja.

## **7 Directly commissioned inspections**

- 7.1 The company shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections to verify compliance with the Donau Soja Guidelines.
- 7.2 The Donau Soja audit shall be conducted at least once a year. Whenever possible, Donau Soja audits and certifications shall always be conducted together and in combination with non-GM inspections.
- 7.3 If the certified company suspends or terminates their Donau Soja activity, Donau Soja Organisation may, at the expense of the company 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.

## **8 Supervisory inspections**

- 8.1 The company shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.

## **9 Miscellaneous**

- 9.1 Special case: In the event of critical supply shortages of certified Donau Soja materials and components, temporary permission can be sought from Donau Soja to allow the purchase of Europe Soya materials and components instead. A written request stating the grounds for the application must be sent to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)), detailing the reason for seeking a substitution, the estimated quantities involved as well as their origin, and the expected timeframe for the supply problem to persist. After evaluating these facts, permission is granted on a case-by-case basis. Written proof of permission must be retained. The food processor is obligated to report the quantity of Europe Soya (ES) materials used to produce Donau Soja (DS) soya products to the Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)) and their DS certification body on a yearly basis, as well as the total amount of DS soya used in this timeframe.

## Transportation and Cleaning

Purpose	Specify the requirements to be met by all participants in the Donau Soja supply chain when transporting Donau Soja produce.
Definition	<p>Transportation: transportation of Donau Soja produce (Donau Soja soya beans, Donau Soja soya products or products consisting of or containing Donau Soja soya beans)</p> <p>Carrier: company or agricultural holding transporting Donau Soja produce (e.g. ship and train loadings)</p> <p>Cleaning: removal of undesirable substances, particularly of genetically modified material</p>
Outline	<p>1 Transportation .....1</p> <p>2 Cleaning .....2</p> <p>3 Directly commissioned inspections.....3</p> <p>4 Supervisory inspections .....3</p>
Status	Version 04: released by the Board on 29 November 2023. Amended 27.07.2024

### 1 Transportation

- 1.1 When transporting Donau Soja soya beans, Donau Soja soya products and products containing or consisting of Donau Soja soya beans, particular care should be taken to ensure that no contamination with genetically modified produce, products of a different quality and/or other undesirable substances occurs.
- 1.2 The container used for the transport (trailer, truck, shipping container, etc.) as well as the facilities and equipment used for loading and unloading goods have to be empty, clean and dry before they come into contact with Donau Soja produce.
- 1.3 In case of vehicles or shipping containers which are not used exclusively for transporting Donau Soja produce, documentary proof of the last three substances transported prior to the current cargo (previous cargoes) needs to be obtained.  
The supporting documents shall, at least, include the following points:
  - name and signature of the driver;
  - registration numbers of the vehicle and the trailer;
  - nature of the cargo;
  - date of transportation.
- 1.4 If any of the three previous cargoes jeopardises the GM-free status of the Donau Soja produce or jeopardises the food or feed safety, a certificate that the container or

vehicle was appropriately cleaned after transportation needs to be provided.<sup>1</sup> The certificate of cleaning shall include the following points:

- name and signature of the person who did the cleaning;
- date and time (from ... to ...) of cleaning;
- cleaning measures;
- place of cleaning.

1.5 The carrier shall document all transportation of Donau Soja produce. The documentation shall include the following points:

- company commissioning the transportation, name and address;
- place of loading and unloading, company, address;
- quantity;
- corresponding lot/ where applicable, traceability certificates.

1.6 If a transportation is carried out by the respective Donau Soja certified company itself, this company shall comply with all requirements concerning the transportation and shall document this compliance.

1.7 If a non Donau Soja certified company is commissioned to carry out the transportation, the Donau Soja certified company commissioning the transportation shall be responsible for compliance with all requirements concerning the transportation. The Donau Soja certified company commissioning the transportation shall monitor and document compliance with these requirements on their own. If this is not possible, this company has to document in writing that these tasks are assumed by the carrier.

1.8 If Donau Soja certified products are temporarily stored at transshipment terminals or port facilities operated by a non-Donau Soja certified company, the Donau Soja certified company commissioning the transportation shall ensure that no contamination and/or mixing of Donau Soja soya with soya of other qualities occurs during storage and that the corresponding Donau Soja Subcontracting Agreement is signed. Inspections of transshipment terminals and port facilities shall be conducted by a certification body recognised by Donau Soja Organisation.

1.9. If Donau Soja certified products are loaded directly onto a ship at transshipment terminals or port facilities, operated by a non Donau Soja certified company, a retained sample of each hold/ container in the ship shall be taken by a certification body recognised by Donau Soja Organisation; this sample shall be stored for at least one year safely and without influencing its quality, ensuring traceability.

## 2 Cleaning

2.1 All facilities (gutters, elevators, drying sections, etc.), equipment (tools, excavators, trucks, etc.) and deposits (silos, warehouses, storage depots, etc.) coming into direct or indirect contact with Donau Soja produce have to be appropriately cleaned before

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<sup>1</sup> E.g. raw materials, food and feed subject to GM labelling as a previous cargo, e.g. soya bean meal or maize

contact if the risk of contamination of Donau Soja produce cannot otherwise be excluded.

- 2.2 Cleaning shall be documented in writing. The documentation shall include the following points:
- name and signature of the person who did the cleaning;
  - date and time (from ... to ...) of cleaning;
  - cleaning measures;
  - reason for cleaning.
- 2.3 The cleaning measures shall be adjusted in such a way that no contamination with genetically modified produce, products of a different quality, substances impairing the food or feed safety and/or other undesirable substances occurs (e.g. wet cleaning of equipment, flushing batches, etc.).

### **3 Directly commissioned inspections**

- 3.1 Compliance with the requirements concerning the transportation of Donau Soja produce and cleaning shall be verified as part of the directly commissioned inspections at all stages of the supply chain.

### **4 Supervisory inspections**

- 4.1 The company or carrier shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.
- 4.2 If a non Donau Soja certified company is commissioned to carry out the transportation, a written confirmation that the carrier accepts supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation shall be provided to the company commissioning the transportation.

## Certification Body

Purpose	Specify the requirements to be met by certification bodies recognised by Donau Soja Organisation.
Definition	Certification body: independent, accredited inspection company verifying compliance with requirements by the participating operations
Outline	1 Contract..... 1 2 Inspectors ..... 1 3 Implementation of inspections, certification and first inspection ..... 1 4 Lot/Traceability Certification ..... 2 5 Remedial Measures ..... 3 6 Inspection reports ..... 4 7 Testing of samples and measures to prevent GM contamination..... 4 8 Data forwarding, reporting ..... 5 9 Quality management, inspections..... 6 10 Information sharing in case of substantial deficiencies or non-compliance with legal requirements..... 6 11 Inspection certificate ..... 6
Status	Version 09: released by the Board on 18.12.2025

### 1 Contract

- 1.1 The certification body and Donau Soja Organisation shall conclude the Donau Soja certification body contract. This contract shall authorise the certification body to offer and carry out inspections and certifications as a recognised Donau Soja certification body.
- 1.2 A recognised Donau Soja certification body shall be authorised to offer and carry out also Europe Soja inspections and certifications.

### 2 Inspectors

- 2.1 The certification body shall only employ inspectors who have sector-specific audit experience as well as the following qualification:
  - initial one-day training on the following topics: GM-free status, requirements for Donau Soja operations and sampling;
  - annual refresher course;
  - annual minimum number and minimum duration of inspections carried out (to be determined by the certification body).

### 3 Implementation of inspections, certification and first inspection

- 3.1 The inspectors shall carry out inspections on the basis of the advance information received (applications; reports of previous inspections where applicable) and in accordance with the following requirements. They shall:

- actively inspect all relevant areas of the site of business;
  - inspect the operating equipment, operational processes and operations documentation;
  - challenge facts;
  - check the plausibility of details given relating to areas under crops, seeds and quantities delivered.
- 3.2 The inspectors shall check all points defined in the requirements documents and the checklist for the relevant type of operation, at the frequency specified for each type of operation and risk level.
- 3.3 The inspectors shall summarise all information including annexes (plans, process descriptions, organisational chart, etc.) in a description of the company. This information shall be completed with evidence (copies of delivery notes, analysis reports, etc.) and the inspectors' own records (particularly the completed checklist). Documentation describing the company shall, in any case, also be drawn up in the English or German language.<sup>1</sup>
- 3.4 During the first inspection, the certification bodies shall check for the first time whether the company inspected has been categorised at the correct risk level. The frequency of further inspections of the company depends on the result of this check. When an inspection certificate is issued for the first time for a primary processor, a compound feed producer or a licensee, this certificate shall be submitted to the certified company only upon confirmation by Donau Soja Organisation to the certification body that a valid contract with the company concerned exists.
- 3.5 If a Donau Soja certified company suspends or terminates their Donau Soja activity, Donau Soja Organisation may demand a final inspection at the expense of the certified company.
- 3.6 The inspectors shall take a sample of Donau Soja soybeans or Donau Soja soya products and shall submit this sample to an analysis as defined in the respective paragraph "Directly Commissioned Inspections" in Requirements 01-06b.

#### **4 Lot/Traceability Certification<sup>2</sup>**

- 4.1 The certification body shall accept harvest declarations from contracted primary agricultural collectors, as well as any quantity declarations of soybeans from alternative systems under Annex 08, and document the quantities declared in the Donau Soja internet portal.
- 4.2 The certification body shall accept requests for lot certificates (LOT) or certificates of traceability (COT) from contracted agricultural collectors, primary collectors, traders or

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<sup>1</sup> "Documentation describing the company" is to be understood as meaning those documents the certification body absolutely needs in order to be able to evaluate the company's conformity with the requirements of the Donau Soja Guidelines. These shall include at least the following documents provided that they are applicable to the respective type of operation: company description form, standard operating procedures to prevent GM contamination (acceptance, storage, processing, transportation, cleaning, carry-over risks), sampling plans, organisational chart.

<sup>2</sup> The use of traceability certificates is optional.



primary processors, and create lot/traceability certificates via the Donau Soja internet portal after a successful plausibility check. Within two working days the certification body shall issue lot/traceability certificates in form of signed PDF documents to the company (with a copy to Donau Soja Organisation), which shall include the following information:

- name, postal and e-mail address of the seller;
- name, postal and e-mail address of the buyer;
- code of the certification body;
- code of the lot/traceability certificate;
- quantity of the soybean lot/product unit certified as Donau Soja;
- harvest year;
- reference number of accompanying documents (e.g. contracts, delivery notes);
- "Donau Soja" logo;
- on COT only: as applicable "CoC model: Quantity Equivalence System" OR "CoC model: Segregated"

Additionally, if available, data on the geolocation<sup>3</sup> of the plots of land on which the soybeans were produced can be provided on request if available.

- 4.3 The certification body shall accept quantity amendment notifications from contracted agricultural collectors and primary collectors, and update the Donau Soja soybean stock in the Donau Soja internet portal. The Donau Soja soybean stock of all agricultural collectors and primary collectors shall be set to 0 (zero) in the internet portal by 1 September of the current calendar year, unless carry-overs were reported within the scope of quantity amendment notifications documented by the certification body in the internet portal.
- 4.4 Certification bodies shall be obliged to use the Donau Soja internet portal for the documentation of harvest declarations, quantity amendment notifications and for issuing lot/traceability certificates.

## **5 Remedial Measures**

- 5.1 In case of non-compliance with any requirement, the inspectors shall determine remedial measures in accordance with the document "Catalogue of Remedial Measures" during their inspections. Each non-compliance issue registered shall be documented by objective evidence (copies of documents, photos, etc.).
- 5.2 If the certification body imposes a level 3 remedial measure, they shall inform Donau Soja Organisation immediately and in writing. Donau Soja Organisation shall be permitted to accompany re-inspections; the re-inspection result shall also be communicated to Donau Soja Organisation in writing.
- 5.3 If the certification body imposes a level 4 remedial measure, they shall inform Donau Soja Organisation immediately and in writing. Donau Soja Organisation shall also be notified in writing of the result of a necessary re-inspection.

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<sup>3</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115).

- 5.4 Before imposing a level 5 remedial measure, the certification body shall inform Donau Soja Organisation in writing of the measure they intend to take and give reasons for their decision to take this measure. A level 5 remedial measure can only be applied if a level 4 remedial measure was imposed before.

## 6 Inspection reports

- 6.1 The inspectors shall summarise the inspection results in inspection reports, which shall include, at the least, the following information about the company inspected:
- current master data including the address of the audited company;
  - audited scopes (abbreviations according to selection in the applied checklist);
  - risk categorisation;
  - non-compliance with the stated requirements (with a reference to the requirements' numerical code, the extent of non-compliance and explanatory notes on this information where applicable).
- 6.2 The inspectors shall hand over to the representative of the company inspected a copy of the inspection report, and obtain an acknowledgement of receipt for this copy.
- 6.3 The certification body shall send both inspection reports and original checklists as well as other documentation gathered and relevant to inspection to Donau Soja Organisation when requested to do so by the latter.

## 7 Testing of samples and measures to prevent GM contamination

- 7.1 For laboratory testing for the presence of GM residues, the certification body shall only employ laboratories accredited for this test procedure in accordance with ISO standard 17025.

- 7.2 If the **certification body** of a **primary processor** is notified of positive PCR test results for GM **soya**:

The certification body shall inform the certification body commissioned by the agricultural collector concerned, and send the relevant lot certificate as well as the test findings to this certification body.

- 7.3 If the **certification body** of a **primary processor** is notified of positive PCR test results for GM **maize**:

The certification body shall conduct a root cause analysis in order to determine whether the contamination occurred accidentally and/or was technically unavoidable. If the contamination did not occur accidentally or was technically avoidable, a warning with a corresponding corrective action shall be issued.

The certification body of the primary processor is responsible for calling in also the certification body of the agricultural collector concerned.

In case of repeated non-accidental or technically avoidable GM contamination, the marketing of the produce as Donau Soja shall be banned until such time as the cause of such contamination has been rectified and the corrective actions have been completely implemented (level 4 remedial measure).

In case of positive PCR results showing GM contents of 0.9 % or more, the primary processor shall remove the lot concerned from the flow of produce and shall not market this lot as Donau Soja (level 4 remedial measure).

- 7.4 If the **certification body** of an **agricultural collector** is notified of positive PCR test results showing GM contents of less than 0.9 %:

The certification body shall immediately inspect the agricultural soybean collector concerned on site, identify and secure during this inspection the retained samples concerned, conduct a root cause analysis of the GM contamination and send the analysis document to Donau Soja Organisation, along with a report on the measures taken. The main purpose of the root cause analysis is to determine whether the GM contamination occurred accidentally and/or was technically unavoidable. If the contamination did not occur accidentally or was technically avoidable, a warning with a corresponding corrective action shall be issued. In case of repeated non-accidental or technically avoidable GM contamination, the marketing of the produce as Donau Soja shall be banned until such time as the cause of such contamination has been rectified and the corrective actions have been completely implemented (level 4 remedial measure).

- 7.5 If the **certification body** of an **agricultural collector** is notified repeatedly of positive PCR test results showing GM contents of less than 0.9 %, or is notified once of a positive PCR test result showing a GM content of 0,9 % or more:

The certification body shall stipulate, in any case and on reasonable notice, that the agricultural collector should separate GM and non-GM produce 100 %, both physically and technically, as a corrective action. The agricultural collector shall remove produce with a GM content of over 0.9 % from the product pipeline and shall not market this produce as Donau Soja (remedial measure 4).

## **8 Data forwarding, reporting**

- 8.1 The certification body shall inform Donau Soja Organisation at least annually (until 31 January of the following year) about the inspection results, providing, at the least, the following data:

- number of inspections conducted for each type of operation;
- number of remedial measures imposed for each type of operation.

- 8.2 Certification bodies shall be obliged to use the Donau Soja internet portal for submitting the following information:

- registration of new companies including contact details and company type (as soon as the inspection contract is signed);
- summary inspection reports;
- inspection certifications;
- harvest declarations and quantity amendment notifications;
- lot/traceability certificates.

- 8.3 Certification bodies shall submit the following details to Donau Soja Organisation no later than one month after the audit has taken place via the Donau Soja internet portal as summary inspection report:

- general information about the company and the type of operation;
- risk level of the company and the country;
- type of audit;
- non-compliance issues identified with corresponding remedial measures and corrective actions.

8.4 The conclusion of new Donau Soja inspection contracts as well as the termination of existing Donau Soja inspection contracts shall be reported immediately and directly to Donau Soja Organisation.

## **9 Quality management, inspections**

- 9.1 The certification body shall accept external supervisory inspections by an inspection body or inspectors commissioned by Donau Soja Organisation. During these inspections, the certification body shall provide insights into the records kept and databases created, and hand over reports generated from this material when requested to do so.
- 9.2 The certification body shall be in possession of a valid accreditation as a certification body in accordance with standard ISO/IEC 17065:2012 in the agriculture and food sector. Certification bodies working in Austria shall also be authorised for the GM-free scope in accordance with the Austrian Food Codex (Codex Alimentarius Austriacus), and shall be recognised by the Austrian ARGE Gentechnik-frei (Platform for GMO-Free Food Products).

## **10 Information sharing in case of substantial deficiencies or non-compliance with legal requirements**

- 10.1 If a certification body learns of any breach of legislation or other deficiencies relevant for Donau Soja Organisation at the site of business of a participant in the Donau Soja system within the scope of audits (for another standard holder), Donau Soja Organisation shall be informed immediately and in writing.

## **11 Inspection certificate**

11.1 Minimum requirements for the information contained in a Donau Soja certificate:

- name and address of the company;
- name, address and Donau Soja code of the certification body;
- activity of the operation according to the definitions in the respective Donau Soja Requirements (e.g. R 02 agricultural soybean collector, R 02 primary collector, R 03 soya trader, R04 primary processor, R05 compound feed producer, etc.);
- Chain of Custody (COC) model: Segregation or Quantity Equivalence System
- certified products;
- reference to the Donau Soja Guidelines;
- period of validity – certificates are valid for 1 or 2 years, depending on the risk-based inspection frequency (Annex 4);
- date of inspection;
- Donau Soja logo.

11.2 If the certification body issues a Donau Soja certificate with an annex (see Requirements for Group Certifications, paragraphs 1 and 2):

The annex shall include the following information on other companies participating in the certification:

- name and address of the company;
- activity of the operation according to the definitions in the respective Donau Soja Requirements (soybean farmer, agricultural soybean collector, primary collector, agricultural processor, etc.).

11.3 The certification body shall submit inspection certifications to Donau Soja Organisation within one week after they have been issued via the Donau Soja internet portal. When an inspection certificate is issued for the first time for a primary processor, a compound feed producer or a licensee, this certificate shall be submitted to the certified company only upon confirmation by Donau Soja Organisation to the certification body that a valid contract with the company concerned exists.

Version 04

## Requirements for the traceability system

Purpose	A summarised presentation of the Donau Soja traceability system, starting from the harvest declaration to the certification of unprocessed soybeans (=lot certification) from the primary agricultural collector to the primary processor as well as of processed soya products (=traceability certification) from the primary processor to the marketer.
Definition	<p><u>Traceability system</u>: the purpose of the Donau Soja traceability system is to continuously transmit relevant information on the origin of products in the supply chain.</p> <p><u>Harvest declaration</u>: the purpose of the harvest declaration is to provide harvest information to the certification body and Donau Soja Organisation.</p> <p><u>Lot certification</u>: the purpose of the Donau Soja lot certification system is to ensure the traceability of unprocessed Donau Soja certified soybeans. Lot-based certification covers the stages from the primary agricultural collector to the primary processor.</p> <p><u>Traceability certification</u>: the purpose of the Donau Soja traceability certification system is to ensure the traceability of processed Donau Soja certified soya products. Traceability certification covers the stages from the primary processor to the marketer on a voluntary basis.</p> <p><b>LOT</b> = lot certificate  <b>COT</b> = certificate of traceability</p>
Outline	<p>1 Traceability of soybean production ..... 1</p> <p>2 Traceability of unprocessed soybeans (=lot certification) ..... 2</p> <p>3 Traceability of processed soya products (=traceability certification) ..... 2</p> <p>4 Selling Donau Soja soybeans and products using certificates..... 2</p> <p>5 Purchasing Donau Soja soya using certificates ..... 3</p> <p>6 Quantity amendment notification ..... 3</p>
Status	Version 04: released by the Board on 18.12.2025

### 1 Traceability of soybean production

- 1.1 Harvest declarations are submitted by the primary collector to both their contracted certification body and Donau Soja Organisation after harvest (see R02, 3.2).
- 1.2 Harvest declarations are the starting point of the traceability system and include the following information:
  - name, postal and e-mail addresses of the primary collector;
  - name, postal and e-mail addresses of the delivering Donau Soja soybean farmers;
  - stock of Donau Soja soybeans;
  - stock of soybean qualities other than Donau Soja;
  - harvest year;
  - date of incoming deliveries and delivery volume of Donau Soja soybean farmers.
  - country of origin and, where relevant, parts thereof;

- geolocation of all plots of land on which the crop was produced<sup>1</sup>.

## **2 Traceability of unprocessed soybeans (=lot certification)**

- 2.1 A lot certificate (LOT) is needed only for trading in unprocessed soybeans, though not for trading in processed soya products or compound feed.
- 2.2 The following operations shall be in possession of Donau Soja lot certificates for trading in unprocessed Donau Soja soybeans:
- soybean farmers (producers) acting as primary collectors by selling Donau Soja soybeans directly to a trader (as defined in Requirements R 02, paragraph 10.2);
  - agricultural collectors / primary collectors (as defined in Requirements R 02);
  - traders (as defined in Requirements R 03); and
  - primary processors (as defined in Requirements R 04).

## **3 Traceability of processed soya products (=traceability certification)**

- 3.1 A certificate of traceability (COT) for placing on the market and trading in processed Donau Soja certified soya products shall be optional.

## **4 Selling Donau Soja soybeans and products using certificates**

- 4.1 The seller shall send lot/traceability certificate requests to their certification body. Each request shall include the following information:
- name and contact information of the buyer;
  - where applicable, codes of the lot/traceability certificates related to the quantity of Donau Soja soya to be sold;
  - type, trade name and quantity of the soybean/product to be sold as Donau Soja soya or to be delivered to the buyer;
  - harvest year;
  - reference number of accompanying documents (e.g. contracts, delivery notes);
- 4.2 The seller shall accept as response from their certification body the lot/traceability certificate in the form of a signed PDF document. The lot/traceability certificate shall include the following information:
- name, postal and e-mail address of the seller;
  - name, postal and e-mail address of the buyer;
  - code of the certification body;
  - code of the lot/traceability certificate;
  - quantity of the soybean lot/product unit certified as Donau Soja;
  - harvest year;
  - reference number of accompanying documents (e.g. contracts, delivery notes);
  - "Donau Soja" logo.

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<sup>1</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.





Additionally, if available, data on the geolocation of the plots of land on which the soybeans were produced can be provided on request<sup>2</sup>.

- 4.3 The maximum quantity of Donau Soja soybeans or products comprised by a lot/unit is the quantity stipulated in the supply contract.
- 4.4 The seller shall send the lot/traceability certificates to the buyer of the corresponding lots/units.

## **5 Purchasing Donau Soja soya using lot certificates / certificates of traceability**

- 5.1 Agricultural collectors, traders and primary processors may only buy Donau Soja soybeans if a lot certificate in the form of a signed document is handed over to them for the corresponding lot or the corresponding contract. This lot certificate shall include the information specified in paragraph 4.2.
- 5.2 Obtaining a certificate of traceability for purchasing, storage, processing and trading of processed Donau Soja soy products is optional.

## **6 Quantity amendment notification**

- 6.1 If quantities delivered to a buyer deviate from the contracted delivery quantities, the company shall send a quantity amendment notification to their certification body, specifying the reason for the notification. The certification body shall then issue the amended lot/traceability certificate to the seller. The seller shall then forward the amended lot/traceability certificate to the buyer.

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<sup>2</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.

Version 04

## Requirements for Group Certifications

Purpose	Specify the requirements for group certifications for agricultural processors, agricultural and primary collectors as well as soya bean farmers (producers).
Outline	1 Group certification for agricultural processors .....1 2 Group certification for agricultural collectors and primary collectors ....2 3 Group certification for soya bean farmers (producers) .....3
Status	Version 04: released by the Board on 29 November 2023

### 1 Group certification for agricultural processors (as defined in R 06a)

Project operators may apply for a group certification at the Donau Soja Organisation provided that the following conditions are met:

- project companies/participants and their suppliers are clearly defined, and the system is closed to the greatest possible extent;
- the contract system between the certification holder and the companies participating in the certification (suppliers) is outlined;
- the group operates its own sound quality management (QM) system, and the suppliers also perform self-monitoring (for detailed criteria, refer to the German VLOG<sup>1</sup>/Austrian Food Codex<sup>2</sup>/Non-GM Danube Region Standard<sup>3</sup>);
- all project companies/participants are subject to a first inspection;
- the frequency of inspections is determined on a risk basis and is compatible with the German VLOG/Austrian Food Codex/Non-GM Danube Region Standard;
- all companies participating in the certification (suppliers) are either listed in the annex to the certificate belonging to the project operator or receive their own certificate indicating the project operator and issued by the directly commissioned certification body.

Group certifications shall be approved on a case-by-case basis on application and following examination by Donau Soja Organisation.

<sup>1</sup> German „Verband Lebensmittel ohne Gentechnik“ (VLOG, <http://www.ohnegentechnik.org>)

<sup>2</sup> 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: [http://www.verbrauchergesundheits.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei\\_RL\\_15\\_1\\_2018.pdf?6fdsmn](http://www.verbrauchergesundheits.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.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25\\_Risikobasierte%20Kontrolle%20Gentechnikfreiheit\\_V03\\_20150304.pdf](http://www.bmwf.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf)

<sup>3</sup> Reference for the Non-GM Danube Region Standard and Inspection Standard: [www.donausoja.org/en/downloads](http://www.donausoja.org/en/downloads)

## **2 Group certification for agricultural collectors and primary collectors (as defined in R 02)**

Agricultural and primary collectors may apply for a group certification at the Donau Soja Organisation provided that the following conditions are met:

- one of the companies is mainly responsible for the group certification and acts as the group manager; this company is responsible for the collectors (for its own collector as well as for other collectors participating in the group certification) and has a complete list of all collectors participating in the group certification at its disposal;
- external inspections of the company mainly responsible for the group certification/group manager (involving, but not limited to, the flow of produce, the internal QM system, and internal audits) are conducted at least once a year;
- a detailed project description is presented, which includes at least the following elements:
  - project companies/participants and their suppliers are clearly defined, and the system is closed to the greatest possible extent,
  - the contract system between the certification holder and the companies participating in the certification (suppliers) is outlined,
  - the company operates a functional internal quality management (QM) system (description), and an overall inspection framework is available,
  - each collector (the group manager's own collector as well as other collectors participating in the group certification) is audited and evaluated once a year in accordance with the internal QM rules,
  - harvest declarations for each collector (the group manager's own collector as well as other collectors participating in the group certification) are collected by the group manager and submitted to Donau Soja Organisation,
  - Declarations of Self-Commitment – Farmers (Soya Bean Producers) are available;
- the aforementioned collectors are subject to a 100% first audit by an external certification body;
- risk classification is based on the first inspection by the external certification body;
- the follow-up audits by an external certification body have an inspection rate of at least 30 % of collectors per year, depending on the risk assessment;
- the audit results (internal and external audits) are submitted to Donau Soja Organisation anytime on request;
- all companies participating in the certification (suppliers) are either listed in the annex to the certificate belonging to the company mainly responsible for the group certification/group manager or receive their own certificate indicating the company mainly responsible for the group certification/group manager and issued by the directly commissioned certification body.

Group certifications shall be approved on a case-by-case basis on application and following examination by Donau Soja Organisation.

### **3 Group certification for soya bean farmers (producers) (as defined in R 01a and R 02)**

Soya bean farmers located in production areas of risk levels 0–2 (F-RL 0, F-RL 1 or F-RL 2) and delivering to a Donau Soja primary collector can participate in a group certification under the direction of this primary collector. The following conditions shall be met for a group certification of soya bean farmers:

- the primary collector is mainly responsible for the group certification and acts as the group manager; this company is responsible for the soya bean farmers (group members) delivering to this collector and has a complete list of all farmers participating in the group certification (group members) at its disposal; in case of group certifications of primary collectors (see paragraph 2), the group manager assumes such responsibility for the entire group;
- the inspection frequency for the primary collector is based on the risk assessment as specified in the Requirements 02, paragraph 1.1, and in Annex 04, paragraph 2;
- the list of farmers is submitted by the primary collector (group manager) to the certification body and to Donau Soja Organisation by 30 November each year;
- the primary collector (group manager) operates a functional internal quality management (QM) system for the group, according to the Requirements R 02, paragraph 7;
- the primary collector (group manager) informs the soya bean farmers (group members) delivering to this collector regularly and proactively about the applicable Donau Soja requirements (see R01a and R01b).

#### **Risk assessment and external inspections**

- The inspection frequency for soya bean farmers (producers) shall be risk-based; the risk classification shall be based on the risk assessment for farmers (see Annex 04, paragraph 1), resulting in the following inspection frequency for farmers (group members) in the scope of group certification:
  - F-RL 0: inspection required every 3 years,
  - F-RL 1: inspection required every 2 years,
  - F-RL 2: annual inspection required;
- the sample size for the inspection of farmers (group members) by an external certification body shall be determined by the total quantity of Donau Soja beans delivered to the primary collector;
  - up to 3,000 tonnes: 1% of the farmers delivering to the primary collector shall be inspected,
  - 3,001 to 9,000 tonnes: 5% of the farmers delivering to the primary collector shall be inspected,
  - 9,001 tonnes and more: the square root of the farmers delivering to the primary collector shall be inspected,
- If the quantity of certified soya beans per farmer is less than 35 tonnes on average (taking into account the total quantity of Donau Soja soya beans delivered to the primary collector divided by the total number of Donau Soja soya bean farmers): the sample size for the inspection of farmers (group members) by an external certification body shall be divided by three.

- If the soya bean farmer (group member) delivers less than 3 tonnes of soya beans to the primary collector in a crop year: these small farmers shall not be included in the sample size calculation for the inspection of farmers (group members). These farmers can be inspected according to the regular inspection frequency.
- in the case of a group certification of primary collectors, the total quantity of Donau Soja beans collected by the entire group can be used as a baseline for determining the sample size;
- a minimum of *one* farmer (group member) per certification period (depending on the F-RL of the farmers) and per primary collector or group of primary collectors shall be inspected;
- the external inspector shall select the farmer(s) (group members) to be inspected in a given year/certification period. In this context, the following aspects shall be taken into account:
  - farmers (group members) who have not been inspected in the previous year(s) shall be given priority for being inspected, unless a significant non-compliance issue was identified during a previous inspection,
  - farmers (group members) selected for inspection, shall be as representative as possible of the farmers in the whole group in terms of size and location;
- the inspection results are submitted to Donau Soja Organisation anytime on request;
- all farmers inspected throughout one year shall be listed in the summary inspection report of the primary collector, including the following information:
  - name and address of the farmer (group member),
  - production area risk level (F-RL),
  - non-compliance issues identified, together with the corresponding remedial measure levels and corrective actions;
- for each farmer inspected who has one or more non-compliance issues greater than or equal to remedial measure level 3, one additional farmer shall be inspected;
- the group certification of farmers shall be an integral part of the inspection contract between the primary collector and a certification body recognised by Donau Soja Organisation; the farmers (group members) themselves shall not be obliged to be listed in this contract or to conclude an inspection contract with a certification body recognised by Donau Soja Organisation;
- the farmers (group members) shall not be listed on the certificate of the primary collector (group manager), nor shall they receive their own certificates.

Version 08

## Declaration of Self-Commitment – Farmers for the Cultivation of Donau Soja soya

Purpose	Declaration of self-commitment for all Donau Soja soya bean farmers (producers).
Definition	<p>Requirement for declarations of self-commitment to be signed by all farmers, deposited/handed over by the farmers at the agricultural collector in their original version and with a copy retained by the farmers</p> <p>Requirement to be translated into the languages of all Donau Soja countries and made available in different versions for:</p> <ul style="list-style-type: none"> <li>• Farmers of risk levels 0 to 2; and</li> <li>• Farmers of risk level 3.</li> </ul>
Outline	<p>1 To comply with the Donau Soja Principles of Soya Bean Cultivation..... 1</p> <p>2 Acceptance of supervisory inspections ..... 3</p> <p>3 Provisions concerning farmers categorised at risk level 0-2 ..... 3</p> <p>4 Provisions concerning farmers categorised at risk level 3 ..... 3</p>
Status	Version 08: released by the Board on 18.12.2025

The farmer undertakes, on behalf of their holding:

### 1 To comply with the Donau Soja Principles of Soya Bean Cultivation

For the farmer, this means, above all, that they ...:

- ... shall conduct business with integrity, respecting applicable laws and avoiding all forms of bribery, conflicts of business interest and fraudulent practices;
- ... shall grow soya beans within the Danube Region as defined by Donau Soja Organisation;
- use of soya bean varieties<sup>1</sup>:  
in EU countries: ... shall only grow GM-free soya bean varieties listed in the national or EU common catalogue of plant varieties,  
in non-EU countries: ... shall only grow GM-free soya bean varieties listed in the respective national catalogue of plant varieties;
- ... shall not grow any other GM crop (e.g. GM maize);
- ... shall not have grown any other GM crop in the previous year;
- ... shall not have grown GM soya beans within the last three years;
- ... shall document all quantities of soya beans, both grown and harvested, by keeping their own records;

<sup>1</sup>Note: The applicable legal requirements concerning the multiplication of seeds (plant variety protection laws) must be observed and complied with;

- plant protection products:
  - in EU countries: ... shall only use plant protection products that have been approved for soya bean cultivation in the respective country,
  - in non-EU countries: ... shall only use plant protection products that have been approved for soya bean cultivation in the respective country and contain only active substances that have been approved in the EU, [providing a reference to the source of information in the respective national language indicating clearly which plant protection products are approved and contain only active substances that are approved in the EU];
  - in all countries:
    - ✓ plant protection products shall be applied using methods that minimise harm to humans and the environment;
    - ✓ Integrated Crop Management techniques shall be applied to minimise negative impacts of phytosanitary products;
    - ✓ a plan for Integrated Crop Management shall be made and implemented;
    - ✓ ...shall document the application of plant protection products, fertilizers and fuel use;
    - ✓ ... shall not use any desiccants prior to harvest (e.g. glyphosate or diquat);
    - ✓ ... shall not use plant protection products listed in the Stockholm and Rotterdam Conventions;
    - ✓ ... shall not use plant protection products whose active substances have been assessed as Class 1a or 1b in the WHO (World Health Organization) Classification of Pesticides by Hazard<sup>2</sup> (e.g. tefluthrin, zeta-cypermethrin or zinc phosphide);
    - ✓ there is no application of pesticides within 30 meters (or more if stated in national laws<sup>3</sup>) of any populated area or water body and all necessary precautions are taken to avoid people entering into recently sprayed areas;
    - ✓ aerial application of pesticides is not allowed;
    - ✓ good agricultural practices shall be implemented;
    - ✓ ... shall have knowledge of techniques to maintain and control soil quality as well as to prevent soil erosion and the relevant techniques are implemented;
- ... shall follow the recommendations contained in the Donau Soja Best Practice Manual, including the recommendations for the use of plant protection products<sup>4</sup>;
- in EU countries: ... shall participate in the implementation of the CAP (Common Agricultural Policy) with mandatory conditionality inspections<sup>5</sup>;
- ... shall submit as an annex to this Declaration a complete list of all plots of land on which the soya beans were produced (including their geolocation);<sup>6</sup>
- ... shall respect nature reserves;
- ... shall only use land dedicated to agricultural use no later than 2008;

<sup>2</sup> The WHO Recommended Classification of Pesticides by Hazard, World Health Organization (2004): Available at [https://www.who.int/ipcs/publications/pesticides\\_hazard/en/](https://www.who.int/ipcs/publications/pesticides_hazard/en/)

<sup>3</sup> In case the minimum distance cannot be kept, a justification shall be provided per e-Mail and approved by Donau Soja Organisation ([quality@donausoja.org](mailto:quality@donausoja.org)).

<sup>4</sup> An updated version of the Best Practice Manual is available at the Donau Soja website: [www.donausoja.org/en/downloads](http://www.donausoja.org/en/downloads)

<sup>5</sup> Does not apply to farmers growing soya beans on less than 1 hectare of land

<sup>6</sup> Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.



- ... shall comply with both national and international labour and social standards (ILO conventions<sup>7</sup>);
- in case of permanent or temporary workers:  
overtime is always voluntary and should be paid in accordance to local and national laws or sector agreements;  
deductions from wages for disciplinary purposes are not made, unless legally permitted. Wages paid are recorded by the employer;
- in areas with traditional land users: where rights have been relinquished by traditional land users there is documented evidence that the affected communities are compensated subject to their free, prior, informed and documented consent;
- communication with local communities: there are communication channels (written sign or website with the following information: email, cell-phone, mailbox) that adequately enable communication between the farmer and the community. The communication channels have been made known to the local communities.

## **2 Acceptance of supervisory inspections**

The farmer accepts risk-based sampling within the scope of Donau Soja Organisation's supervisory inspections.

## **3 Provisions concerning farmers categorised at risk level 0-2**

**Paragraphs 1 and 2 shall apply to all Donau Soja farmers.**

Farmers categorised in a production area of **risk level 0-2** (F-RL 0, F-RL 1 or F-RL 2) agree to be subject to risk-based inspections by the certification body of the primary collector within the framework of the Donau Soja farmer group certification.

## **4 Provisions concerning farmers categorised at risk level 3**

**Paragraphs 1 and 2 shall apply to all Donau Soja farmers.**

Farmers categorised in a production area of risk level 3 (F-RL 3) shall notify Donau Soja Organisation that they cultivate Donau Soja soya:

Farmers located in a production area of **risk level 3** (F-RL 3) (where the cultivation of GM soya beans is allowed) shall notify Donau Soja Organisation by e-mail that they cultivate Donau Soja soya by 30 July of the current harvest year ([quality@donausoja.org](mailto:quality@donausoja.org)) and document the use of original seeds (invoices).

Alternatively, the farmer can be registered by their primary collector (also by 30 July of the current harvest year). In addition to the supervisory inspections of the farmer by or on behalf of Donau Soja Organisation, the farmer shall be obliged to have their holding inspected externally before the first Donau Soja harvest, so that they are able to present a valid certificate to the agricultural collector when delivering the harvest. This external inspection shall be repeated annually.

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<sup>7</sup> Annex with ILO conventions

Version 01

## Catalogue of Remedial Measures

Purpose	Specify appropriate remedial measures for Donau Soja system partners.
Definition	Remedial measure = measure to be taken when any Donau Soja system partner does not comply with any of the requirements
Outline	1 Remedial measure level 1: reprimand .....1 2 Remedial measure level 2: enhanced record-keeping and notification requirements .....1 3 Remedial measure level 3: chargeable re-inspection .....1 4 Remedial measure level 4: exclusion of produce/lots concerned from marketing.....2 5 Remedial measure level 5: termination of contract where applicable and exclusion from marketing .....2 6 Non-compliance issues and remedial measures.....2
Status	Version 01: released by the Board on 16 January 2013

### 1 Remedial measure level 1: reprimand

- 1.1 A level 1 remedial measure is imposed for minor non-compliance issues occurring for the first time and having no impact on product quality.
- 1.2 An immediate correction of deficiencies is required at this remedial measure level.

### 2 Remedial measure level 2: enhanced record-keeping and notification requirements

- 2.1 A level 2 remedial measure is imposed for repeated minor non-compliance issues.
- 2.2 Enhanced documentation requirements within a given period are required at this remedial measure level: improved record-keeping with regard to the accountability of compliance with the specifications and submitting relevant missing documentation to the certification body.

### 3 Remedial measure level 3: chargeable re-inspection

- 3.1 A chargeable re-inspection by the certification body is required at this remedial measure level.
- 3.2 Chargeable re-inspections are imposed for all (repeated) infringements covered by points 1 and 2 – particularly when it is necessary to verify whether a deficiency was corrected in time.
- 3.3 Furthermore, a level 3 remedial measure is imposed for major non-compliance issues which, however, do not yet entail a marketing ban.
- 3.4 If the certification body imposes a level 3 remedial measure, they shall inform Donau Soja Organisation immediately and in writing. Donau Soja Organisation shall also be notified in writing of the re-inspection result.

#### **4 Remedial measure level 4: exclusion of produce/lots concerned from marketing**

- 4.1 The exclusion of the lots concerned from being marketed as "Donau Soja" is required at this remedial measure level.
- 4.2 A level 4 remedial measure is imposed immediately for very serious non-compliance issues, or if a chargeable re-inspection within the scope of a level 3 remedial measure has a negative result.
- 4.3 If the certification body imposes a level 4 remedial measure, they shall inform Donau Soja Organisation immediately and in writing. Donau Soja Organisation shall also be notified in writing of the result of a necessary re-inspection.

#### **5 Remedial measure level 5: termination of contract where applicable and exclusion from marketing**

- 5.1 A level 5 remedial measure is imposed for very serious non-compliance issues showing that the necessary requirements cannot be met in a sustained manner.
- 5.2 Before imposing a level 5 remedial measure, the certification body shall inform Donau Soja Organisation in writing of the measure they intend to take and give reasons for their decision to take this measure. A level 5 remedial measure can only be applied if a level 4 remedial measure was imposed before.
- 5.3 In case of primary processors, compound feed producers and marketers/distributors of Donau Soja products (consisting of Donau Soja, containing Donau Soja, or having been produced as animal feed using Donau Soja, and labelled as such), the termination of the contract with Donau Soja Organisation, as well as the exclusion of the produce from being marketed under the product name "Donau Soja" or "fed with Donau Soja" are required at this remedial measure level. All partners who have a contract with Donau Soja Organisation shall be notified immediately of the imposition of such remedial measure.
- 5.4 In case of farmers, agricultural collectors, traders and other operations producing and/or processing soya designated as "Donau Soja" AND not having a direct contract with Donau Soja Organisation, a permanent marketing ban for Donau Soja shall be imposed on the operation concerned following the notification of Donau Soja Organisation by the certification body. All partners who have a contract with Donau Soja Organisation shall be notified immediately of the imposition of such remedial measure.

#### **6 Non-compliance issues and remedial measures**

- 6.1 In case of non-compliance with any requirement, the inspectors shall determine remedial measures in accordance with the present document "Catalogue of Remedial Measures" during their inspections.
- 6.2 Each non-compliance issue registered shall be documented by objective evidence (copies of documents, photos, etc.).

- 6.3 If the non-compliance issues identified entail a level 3 or level 4 remedial measure, Donau Soja Organisation shall be informed immediately. In case of a level 5 remedial measure, Donau Soja Organisation shall be informed before imposing the remedial measure.
- 6.4 In case of serious non-compliance issues the Donau Soja catalogue of penalties shall be applied.

## ANNEX 01, Version 03

### Applicable legislation and international conventions

The purpose of this annex is to clarify and specify the obligation for legal compliance and compliance with international conventions. It provides an overview of applicable international conventions, provisions of the EU Common Agricultural Policy and other applicable provisions of European Union legislation.

#### International Conventions

Conventions and Recommendations of the International Labour Organisation (ILO)
No. 87 Freedom of Association and Protection of the Right to Organise Convention, 1948
No. 98 Right to Organise and Collective Bargaining Convention, 1949
No. 29 Forced Labour Convention, 1930
No. 105 Abolition of Forced Labour Convention, 1957
No. 138 Minimum Age Convention, 1973
No. 182 Worst Forms of Child Labour Convention, 1999
No. 100 Equal Remuneration Convention, 1951
No. 111 Discrimination (Employment and Occupation) Convention, 1958
No. 129 Labour Inspection (Agriculture) Convention, 1969
No. 169 Indigenous and Tribal Peoples Convention, 1989
No. 184 Safety and Health in Agriculture Convention, 2001 (No. 184)
No. 155 Occupational Safety and Health Convention, 1981
Code of practice on safety and health in agriculture
United Nations Convention on the Rights of the Child, Art. 28
Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat
Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade, Annex III
Stockholm Convention on Persistent Organic Pollutants
Convention on International Trade in Endangered Species of Wild Fauna and Flora

#### EU Legislation

The following list gives an overview of the most important directives and regulations of the European Union to be complied with.

#### Social and Labour Regulations

Treaty on the Functioning of the EU
2000/C 364/01 Charter of fundamental rights of the EU, Art. 14,
European Convention on Human Rights
Directive 89/391/EEC, on the introduction of measures to encourage improvements in the safety and health of workers.
Directive 89/654/EEC, concerning the minimum safety and health requirements for the workplace
Directive 89/655/EEC and Directive 89/656/EEC on Personal Protective Equipment for workers.
Directive 2001/45/EC, concerning the minimum safety and health requirements for the use of work equipment by workers at work
Directive 92/58/EEC, on the minimum requirements for the provision of safety and / or health signs at work
Directive 2003/88/EC (Working Time Directive)

Directive 94/33/EC, on the Protection of Young People at Work
Council Directive 2000/78/EC, on establishing a general framework for equal treatment in employment and occupation
Directive 2006/54/EC, on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation
Directive 2011/36/EU, on preventing and combating trafficking in human beings and protecting its victims.
Directive 91/533/EEC, on an employer's obligation to inform employees of the conditions applicable to the contract or employment relationship.

## Food Safety

Regulation (EC) No 178/2002, on the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Regulation (EC) No 852/2004, on the Hygiene of Food-stuffs
Regulation (EC) 2009/41 (GMO Contained Use in Experiments)
Regulation (EC) 2001/18 (Introduction of GMOs)
Regulation (EC) 1829/2003 (Food and Feed)
Regulation (EC) 1830/2003 (Traceability and Labeling)

## Environment

Directive 92/43/EC (Habitat Directive).
Directive 2009/147/EC (Wild Birds)
Regulation (EU) 2023/1115 (Deforestation)
Decision 1386/2013/EU of the European Parliament and of the council, on a General Union Environment Action Programme to 2020 'Living well, within the limits of our planet
Regulation (EU) 1143/2014 (Prevention and management of the introduction and spread of invasive alien species)
Council Directive 2000/29/EC (Protection against the introduction and spread of organisms harmful to plants or plant products)
Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.
Directive 2008/98/EC (Waste Framework Directive)
Directive 2000/60/EC (Water Framework Directive)
Council Directive 80/68/EEC (Protection of Groundwater against pollution with Dangerous Substances)
Directive 2006/118/EC (Groundwater Directive)
Council Directive 91/676/EEC (Nitrate Directive)
Regulation (EG) Nr. 2003/2003 (Approved Fertilizers)
Council Directive 86/278/EEC (Sewage Sludge Directive)
Directive 2009/128/EC, on sustainable Use of Pesticides
Regulation (EC) 1107/2009, on Placing Plant Protection Products on the Market
Directive 2009/127/EC, on Pesticide Application Machinery

## Conditionality

The rules on conditionality, listed in Annex III to Council Regulation (EU) No 2021/2115, relate to the following areas: climate and environment; public health, and plant health; animal welfare. Donau Soja farmers located in the European Union are subject to conditionality. Areas not relevant for arable crop production are left out (e.g. animal welfare, identification of animals).

Topic	Requirements and Standards
Water (SMR 1)	Directive 2000/60/EC of 23 October 2000 of the European Parliament and of the Council establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1): Article 11(3), point (e), and point (h), as regards mandatory requirements to control diffuse sources of pollution by phosphates
Water (SMR 2)	Council Directive 91/676/EEC of 12 December 1991 concerning the protection of waters against pollution caused by nitrates from agricultural sources (OJ L 375, 31.12.1991, p. 1): Articles 4 and 5
Biodiversity and landscape (SMR 3)	Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7): Article 3(1), Article 3(2), point (b), Article 4(1), (2) and (4)
Biodiversity and landscape (SMR 4)	Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna (OJ L 206, 22.7.1992, p. 7): Article 6(1) and (2)
Food safety (SMR 5)	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety (OJ L 31, 1.2.2002, p. 1): Articles 14 and 15, Article 17(1) (6) and Articles 18, 19 and 20
Food safety (SMR 6)	Council Directive 96/22/EC of 29 April 1996 concerning the prohibition on the use in stockfarming of certain substances having a hormonal or thyrostatic action and beta-agonists, and repealing Directives 81/602/EEC, 88/146/EEC and 88/299/EEC (OJ L 125, 23.5.1996, p. 3): Article 3, points (a), (b), (d) and (e), and Articles 4, 5 and 7
Plant protection products (SMR 7)	Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, p. 1): Article 55, first and second sentence
Plant protection products (SMR 8)	Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides (OJ L 309, 24.11.2009, p. 71): Article 5(2) and Article 8(1) to (5) Article 12 with regard to restrictions on the use of pesticides in protected areas defined on the basis of Directive 2000/60/EC and Natura 2000 legislation



	Article 13(1) and (3) on handling and storage of pesticides and disposal of remnants
Climate change (GAEC 1)	Maintenance of permanent grassland based on a ratio of permanent grassland in relation to agricultural area at national, regional, subregional, group-of-holdings or holding level in comparison to the reference year 2018 Maximum decrease of 5 % compared to the reference year
Climate change (GAEC 2)	Protection of wetland and peatland
Climate change (GAEC 3)	Ban on burning arable stubble, except for plant health reasons
Water (GAEC 4)	Establishment of buffer strips along water courses
Soil (GAEC 5)	Tillage management, reducing the risk of soil degradation and erosion, including consideration of the slope gradient
Soil (GAEC 6)	Minimum soil cover to avoid bare soil in periods that are most sensitive
Soil (GAEC 7)	Crop rotation in arable land, except for crops growing under water
Biodiversity and landscape (GAEC 8)	<ul style="list-style-type: none"> <li>—Minimum share of agricultural area devoted to non-productive areas or features (5)</li> <li>—Minimum share of at least 4 % of arable land at farm level devoted to non-productive areas and features, including land lying fallow.</li> <li>—Where a farmer commits to devote at least 7 % of his/her arable land to non-productive areas or features, including land lying fallow, under an enhanced eco-scheme in accordance with Article 31(6), the share to be attributed to compliance with this GAEC standard shall be limited to 3 %.</li> <li>—Minimum share of at least 7 % of arable land at farm level if this includes also catch crops or nitrogen fixing crops, cultivated without the use of plant protection products, of which 3 % shall be land lying fallow or non-productive features. Member States should use the weighting factor of 0,3 for catch crops.</li> <li>—Retention of landscape features</li> <li>—Ban on cutting hedges and trees during the bird breeding and rearing season</li> <li>—As an option, measures for avoiding invasive plant species</li> </ul>
Biodiversity and landscape (GAEC 9)	Ban on converting or ploughing permanent grassland designated as environmentally-sensitive permanent grasslands in Natura 2000 sites

**ANNEX 02, Version 01**

## **Requirements for Donau Soja Produce with Restricted Geographic Origin**

Purpose	Specify the requirements to declare and/or label the origin of Donau Soja produce with additionally restricted geographic origin. The requirements cover the entire value chain from the soya bean farmer to the final product. This Annex can be seen as an add-on module to the Donau Soja Guidelines.
Definition	Restricted geographic origin: Specific and verified geographic area, more restricted than defined in the Donau Soja Guidelines (e.g. specific region or country) Donau Soja produce: Donau Soja soya beans, Donau Soja soya products or products consisting of or containing Donau Soja soya beans
Outline	1 Requirements ..... 1 2 Directly commissioned inspections..... 2
Status	Version 01: released by the Board on 26 September 2019

### **1 Requirements**

- 1.1 An organisation or an individual operation may apply for a declaration and/or labelling of more restricted geographic origin for Donau Soja quality products by submitting a written application to Donau Soja Organisation.
- 1.2 The organisation or operation applying for a declaration and/or labelling of restricted geographic origin within the scope of Donau Soja certification shall be situated in the respective country or region.
- 1.3 The wording of the declaration shall be agreed between Donau Soja Organisation and the respective organisation or operation.
- 1.4 In addition to the declaration, the produce (packaging) itself may be labelled. The label shall be agreed between Donau Soja Organisation and the respective organisation or operation.
- 1.5 The basis for using the agreed declaration and/or labelling (see 1.3 and 1.4) shall be compliance with all requirements of the Donau Soja Guidelines according to the scope of the operation.
- 1.6 All Donau Soja produce of restricted geographic origin shall be separated both physically and technically from all other qualities (including Donau Soja and Europe Soya qualities) in the areas of incoming produce, storage, processing and outgoing produce.
- 1.7 The quantitative flow of Donau Soja produce of restricted geographic origin shall be monitored based on actual incoming produce and produce leaving for sale or production use (calculation of the quantitative flow). The certification body shall be entitled to request and inspect individual delivery notes and invoices.



1.8 The restricted geographic origin shall be indicated on all accompanying shipping documents (invoices and delivery notes).

1.9 A list of products of certified restricted geographic origin shall be available.

## **2 Directly commissioned inspections**

2.1 Compliance with the requirements for Donau Soja produce with restricted geographic origin shall be verified as part of the directly commissioned Donau Soja inspections.

## ANNEX 03, Version 01

### Glossary

<b>Buffer zones<sup>1</sup></b>	Buffers zones are small areas or strips of land in permanent vegetation, designed to intercept pollutants and manage other environmental concerns. Buffer zones include among others: riparian buffer strips, filter strips, grassed waterways, shelterbelts, windbreaks, field borders, alley cropping, herbaceous wind barriers.
<b>Certified seed</b>	Internationally common name for seed that complies with the legal requirements.
<b>Conversion<sup>2</sup></b>	Change of a natural ecosystem to another land use or profound change in a natural ecosystem's species composition, structure, or function. Deforestation is one form of conversion (conversion of natural forests). Conversion includes severe degradation or the introduction of management practices that result in substantial and sustained change in the ecosystem's former species composition, structure, or function. Change to natural ecosystems that meets this definition is considered to be conversion regardless of whether or not it is legal.
<b>Cropland<sup>3</sup></b>	<p>Arable and tillable land and agroforestry systems where the vegetation structure falls below the thresholds used for the Forest Land category, and is not expected to exceed those thresholds at a later time. Cropland includes:</p> <ul style="list-style-type: none"> <li>• annual crops, including cereals, oils seeds, vegetables, root crops and forages;</li> <li>• perennial crops, including trees and shrubs, in combination with herbaceous crops (e.g. agroforestry), or as orchards, vineyards, plantations and short rotation coppice, except where these lands meet the criteria for categorisation as forest;</li> <li>• temporary fallow land (i.e., land set at rest for one or several years before being cultivated again).</li> </ul> <p>Arable land which is normally used for cultivation of annual crops but which is temporarily (no longer than 5 years) used for forage crops or grazing as part of an annual crop-pasture rotation (mixed system) is included under cropland.</p>
<b>Donau Soja cultivation areas</b>	<p>The countries and regions of origin for Donau Soja are defined in both political and geographical terms.</p> <p>The enumeration of countries where Donau Soja can be produced is based on the list of countries in the Danube river basin as delineated by the International Commission for the Protection of the Danube River.<sup>4</sup></p>
<b>Deforestation<sup>5</sup></b>	Loss of natural forest as a result of: i) conversion to agriculture or other non-forest land use; ii) conversion to a tree plantation; or iii) severe and sustained degradation.
<b>Drainage<sup>6</sup></b>	Artificial removal of water from land; drainage is employed in the

<sup>1</sup> Compare with USDA:

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/plantmaterials/technical/publications/?cid=stelprdb1042930#:~:text=Plants%20for%20Conservation%20Buffers,pollution%2C%20and%20improve%20wildlife%20habitat.>

<sup>2</sup> [https://accountability-framework.org/definitions/?definition\\_category=17](https://accountability-framework.org/definitions/?definition_category=17)

<sup>3</sup> Compare with IPCC: [https://www.ipcc-ngqip.iges.or.jp/public/2006gl/pdf/4\\_Volume4/V4\\_05\\_Ch5\\_Cropland.pdf](https://www.ipcc-ngqip.iges.or.jp/public/2006gl/pdf/4_Volume4/V4_05_Ch5_Cropland.pdf)

<sup>4</sup> <https://www.icpdr.org/main/danube-basin/countries-danube-river-basin>

<sup>5</sup> [https://accountability-framework.org/definitions/?definition\\_category=17](https://accountability-framework.org/definitions/?definition_category=17)

<sup>6</sup> <https://www.britannica.com/topic/drainage>

	reclamation of wetlands, in the prevention of erosion, and as a concomitant of irrigation in the agriculture of arid regions.
<b>Ecological corridor<sup>7</sup></b>	A clearly defined geographical space that is governed and managed over the long term to maintain or restore effectively the unimpeded movement of species and the flow of natural processes (i.e. ecological connectivity).
<b>Europe Soya cultivation areas</b>	The countries and regions of origin for Europe Soya are defined in both political and geographical terms. The borders of the Europe Soya region are based on the definition of the delimitation of the Russian border regions, as given by Philip Johan von Strahlenberg.

**Forest<sup>8</sup>** Land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10 percent, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or other land use. Forest includes *natural forests* (see definition below) and *tree plantations* (see definition below).

#### Natural forest<sup>9</sup>

A forest that is a natural ecosystem.

Natural forests possess many or most of the characteristics of a forest native to the given site, including species composition, structure and ecological function. Natural forests include:

- primary forests that have not been subject to major human impacts in recent history;
- regenerated (second-growth) forests that were subject to major impacts in the past (for instance by agriculture, livestock raising, tree plantations, or intensive logging) but where the main causes of impact have ceased or greatly diminished and the ecosystem has attained much of the species composition, structure and ecological function of prior or other contemporary natural ecosystems;
- managed natural forests where much of the ecosystem's composition, structure and ecological function exist in the presence of activities such as:
  - harvesting of timber or other forest products, including management to promote high-value species,
  - low intensity, small-scale cultivation within the forest, such as less-intensive forms of swidden agriculture in a forest mosaic;
- Forests that have been partially degraded by anthropogenic or natural causes (e.g. harvesting, fire, climate change, invasive species, or others) but where the land has not been converted to another use and where degradation does not result in the sustained reduction of tree cover below the thresholds that define a forest or sustained loss of other main elements of ecosystem composition, structure and ecological function.

#### Tree plantation<sup>10</sup>

A forest predominantly composed of trees established through planting

<sup>7</sup> <https://portals.iucn.org/library/sites/library/files/documents/PAG-030-En.pdf>

<sup>8</sup> [https://accountability-framework.org/definitions/?definition\\_category=17](https://accountability-framework.org/definitions/?definition_category=17)

<sup>9</sup> [https://accountability-framework.org/definitions/?definition\\_category=17](https://accountability-framework.org/definitions/?definition_category=17)

<sup>10</sup> [https://accountability-framework.org/definitions/?definition\\_category=17](https://accountability-framework.org/definitions/?definition_category=17)

	and/or deliberate seeding that lacks key elements of a natural forest native to the area, such as species composition and structural diversity.
<b>GM-free</b>	<p>The GM-free status is based on the minimum requirements set out by the following European "GM-free" certification schemes:</p> <ul style="list-style-type: none"> <li>• German EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG), with audits conducted as stipulated by the German Verband Lebensmittel ohne Gentechnik (VLOG);</li> <li>• 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");</li> <li>• Non-GM Danube Region Production and Labelling Standard &amp; Non-GM Danube Region Inspection Standard.</li> </ul>
<b>Good Agricultural Practices<sup>11</sup></b>	The application of available knowledge to addressing environmental, economic and social sustainability for on-farm production and post-production processes resulting in safe and healthy food and non-food agricultural products.
<b>Grassland<sup>12</sup></b>	Terrestrial ecosystems dominated by herbaceous or shrub vegetation for at least five years continuously. It includes meadows or pasture that is cropped for hay but excludes land cultivated for other crop production and cropland lying temporarily fallow.
<b>Integrated Crop Management</b>	A system of crop production which conserves and enhances natural resources while producing a crop on an economically viable and sustainable foundation. This is a whole-farm, long-term strategy incorporating both new technologies and traditional knowledge and practices.
<b>Integrated Pest Management<sup>13</sup></b>	Integrated Pest Management means careful consideration of all available plant protection methods and subsequent integration of appropriate measures that discourage the development of populations of harmful organisms and keep the use of plant protection products and other forms of intervention to levels that are economically and ecologically justified and reduce or minimise risks to human health and the environment. Integrated Pest Management emphasises the growth of a healthy crop with the least possible disruption to agro-ecosystems and encourages natural pest control mechanisms.

General principles of integrated pest management:

1. The prevention and/or suppression of harmful organisms should be achieved or supported among other options especially by:
  - crop rotation;
  - use of adequate cultivation techniques (e.g. stale seedbed technique, sowing dates and densities, under-sowing, conservation tillage, pruning and direct sowing);
  - use, where appropriate, of resistant/tolerant cultivars and standard/certified seed and planting material;
  - use of balanced fertilisation, liming and irrigation/drainage practices;

<sup>11</sup> <http://www.fao.org/3/y8704e/y8704e.htm>

<sup>12</sup> Compare with Commission Regulation (EU) No 1307/2014: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R1307&from=EN>

<sup>13</sup> Compare with Directive 2009/128/EC: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0128&from=EN>

- preventing the spreading of harmful organisms by hygiene measures (e.g. by regular cleansing of machinery and equipment);
  - protection and enhancement of important beneficial organisms, e.g. by adequate plant protection measures or the utilisation of ecological infrastructures inside and outside production sites.
2. Harmful organisms must be monitored by adequate methods and tools, where available. Such adequate tools should include observations in the field as well as scientifically sound warning, forecasting and early diagnosis systems, where feasible, as well as the use of advice from professionally qualified advisors.
  3. Based on the results of the monitoring, the professional user has to decide whether and when to apply plant protection measures. Robust and scientifically sound threshold values are essential components for decision making. For harmful organisms, threshold levels defined for the region, specific areas, crops and particular climatic conditions must be taken into account before treatments, where feasible.
  4. Sustainable biological, physical and other non-chemical methods must be preferred to chemical methods if they provide satisfactory pest control.
  5. The pesticides applied shall be as specific as possible for the target and shall have the least side effects on human health, non-target organisms and the environment.
  6. The professional user should keep the use of pesticides and other forms of intervention to levels that are necessary, e.g. by reduced doses, reduced application frequency or partial applications, considering that the level of risk in vegetation is acceptable and they do not increase the risk for development of resistance in populations of harmful organisms.
  7. Where the risk of resistance against a plant protection measure is known and where the level of harmful organisms requires repeated application of pesticides to the crops, available anti-resistance strategies should be applied to maintain the effectiveness of the products. This may include the use of multiple pesticides with different modes of action.
  8. Based on the records on the use of pesticides and on the monitoring of harmful organisms, the professional user should check the success of the applied plant protection measures.

<b>Land-use change<sup>14</sup></b>	Changes in terms of land cover between land categories (forest, grassland, cropland, wetlands). This means e.g. that a change from grassland to cropland is a land-use change, while a change from one crop (such as maize) to another (such as soya) is not. Cropland includes fallow land (i.e. land set at rest for one or several years before being cultivated again). A change of management activities, tillage practice or manure input practice is not considered land-use change.
<b>Landscape</b>	Features adjacent to an agricultural parcel. These include but are not

<sup>14</sup> Compare with Communication from the Commission on the practical implementation of the EU biofuels and bioliquids sustainability scheme and on counting rules for biofuels: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:160:0008:0016:EN:PDF>



<b>features<sup>15</sup></b>	limited to hedges, ponds, ditches, trees (in line, in group or isolated), field margins and terraces.
<b>Natural habitat<sup>16</sup></b>	Terrestrial or aquatic areas distinguished by geographic, abiotic and biotic features, whether entirely natural or semi-natural.
<b>Peatland</b>	Peatland soils are soils with horizons of organic material (peat substrate) of a cumulative thickness of at least 30 cm at a depth of down to 60 cm. The organic matter contains at least 20 mass percent of organic carbon in the fine soil.
<b>Protected area<sup>17</sup></b>	A geographically defined area which is designated or regulated and managed to achieve specific conservation objectives.
<b>Protection goals<sup>18</sup></b>	To fulfil the protection goals within a protected area means to contribute towards ensuring biodiversity in that area through the conservation of natural habitats and of wild flora and fauna.
<b>Riparian buffer strips<sup>19</sup></b>	Linear bands of permanent vegetation adjacent to an aquatic ecosystem intended to maintain or improve water quality by trapping and removing various nonpoint source pollutants from both overland flow and shallow subsurface flow (interflow).
<b>Semi-natural habitat<sup>20</sup></b>	An ecosystem with most of its processes and biodiversity intact, though altered by human activity in strength or abundance relative to the natural state.
<b>Standard<sup>21</sup></b>	Document that provides, for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods.
<b>Wetlands<sup>22</sup></b>	Areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres.

Hence, wetlands include a wide variety of inland habitats such as marshes, peatlands, floodplains, rivers and lakes, and coastal areas such as saltmarshes, mangroves, intertidal mudflats and seagrass beds, and also coral reefs and other marine areas no deeper than six metres at low tide, as well as human-made wetlands such as dams, reservoirs, rice paddies and wastewater treatment ponds and lagoons.

#### Natural Wetlands

#### Marine and Coastal Wetlands

A -- Permanent shallow marine waters in most cases less than six meters deep at low tide; includes sea bays and straits.

<sup>15</sup> Compare with Regulation (EU) No 1306/2013: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1306&from=EN>

<sup>16</sup> Compare with Council Directive 92/43 EEC: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>

<sup>17</sup> <https://www.cbd.int/doc/legal/cbd-en.pdf>

<sup>18</sup> Compare with Council Directive 92/43/EEC: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>

<sup>19</sup> <https://climate-adapt.eea.europa.eu/metadata/adaptation-options/establishment-and-restoration-of-riparian-buffer-s>

<sup>20</sup> <https://ipbes.net/glossary/semi-natural-habitats>

<sup>21</sup> [https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL\\_Standard\\_Setting\\_Code\\_v6\\_Dec\\_2014.pdf](https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Standard_Setting_Code_v6_Dec_2014.pdf)

<sup>22</sup> Compare with An Introduction to the Convention on Wetlands (previously The Ramsar Convention Manual). Ramsar Convention Secretariat, Gland, Switzerland: [https://www.ramsar.org/sites/default/files/documents/library/handbook1\\_5ed\\_introductiontoconvention\\_e.pdf](https://www.ramsar.org/sites/default/files/documents/library/handbook1_5ed_introductiontoconvention_e.pdf)



B -- Marine subtidal aquatic beds; includes kelp beds, sea-grass beds, tropical marine meadows.  
 C -- Coral reefs.  
 D -- Rocky marine shores; includes rocky offshore islands, sea cliffs.  
 E -- Sand, shingle or pebble shores; includes sand bars, spits and sandy islets; includes dune systems and humid dune slacks.  
 F -- Estuarine waters; permanent water of estuaries and estuarine systems of deltas.  
 G -- Intertidal mud, sand or salt flats.  
 H -- Intertidal marshes; includes salt marshes, salt meadows, saltings, raised salt marshes; includes tidal brackish and freshwater marshes.  
 I -- Intertidal forested wetlands; includes mangrove swamps, nipah swamps and tidal freshwater swamp forests.  
 J -- Coastal brackish/saline lagoons; brackish to saline lagoons with at least one relatively narrow connection to the sea.  
 K -- Coastal freshwater lagoons; includes freshwater delta lagoons.  
 Zk(a) -- Karst and other subterranean hydrological systems, marine/coastal

#### Inland Wetlands

L -- Permanent inland deltas.  
 M -- Permanent rivers/streams/creeks; includes waterfalls.  
 N -- Seasonal/intermittent/irregular rivers/streams/creeks.  
 O -- Permanent freshwater lakes (over 8 ha); includes large oxbow lakes.  
 P -- Seasonal/intermittent freshwater lakes (over 8 ha); includes floodplain lakes.  
 Q -- Permanent saline/brackish/alkaline lakes.  
 R -- Seasonal/intermittent saline/brackish/alkaline lakes and flats.  
 Sp -- Permanent saline/brackish/alkaline marshes/pools.  
 Ss -- Seasonal/intermittent saline/brackish/alkaline marshes/pools.  
 Tp -- Permanent freshwater marshes/pools; ponds (below 8 ha), marshes and swamps on inorganic soils; with emergent vegetation water-logged for at least most of the growing season.  
 Ts -- Seasonal/intermittent freshwater marshes/pools on inorganic soils; includes sloughs, potholes, seasonally flooded meadows, sedge marshes.  
 U -- Non-forested peatlands; includes shrub or open bogs, swamps, fens.  
 Va -- Alpine wetlands; includes alpine meadows, temporary waters from snowmelt.  
 Vt -- Tundra wetlands; includes tundra pools, temporary waters from snowmelt.  
 W -- Shrub-dominated wetlands; shrub swamps, shrub-dominated freshwater marshes, shrub carr, alder thicket on inorganic soils.  
 Xf -- Freshwater, tree-dominated wetlands; includes freshwater swamp forests, seasonally flooded forests, wooded swamps on inorganic soils.  
 Xp -- Forested peatlands; peat swamp forests.  
 Y -- Freshwater springs; oases.  
 Zg -- Geothermal wetlands  
 Zk(b) -- Karst and other subterranean hydrological systems, inland  
 Note: "floodplain" is a broad term used to refer to one or more wetland types, which may include examples from the R, Ss, Ts, W, Xf, Xp, or other wetland types. Some examples of floodplain wetlands are

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seasonally inundated grassland (including natural wet meadows), shrublands, woodlands and forests. Floodplain wetlands are not listed as a specific wetland type herein.

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## Risk-based Donau Soja Inspection System

The Donau Soja inspection system is risk-based. Different risk categories are applied to determine the respective production area risk level (F-RL) for agricultural producers (farmers) and the individual risk for all other certified companies in the supply chain. The risk-based inspection system is applicable to soybeans and other arable crops (see Annex 6).

The risk categories shall be used to determine:

1. the frequency of inspections and supervisory inspections by an independent third party (i.e. an independent certification body);
2. the frequency of supervisory inspections by Donau Soja Organisation;
3. the applicability of certain additional quality assurance requirements (e.g. GMO analysis, pesticide analysis).

### 1 Risk assessment for individual farmers or farmer groups

#### 1.1 Risk categories

At the level of the agricultural producer (farmer), the following five risk categories (a-e) shall be defined:

- (a) Contamination with GMO:** Refers to the risk that Donau Soja arable crops are contaminated with genetically modified material. This risk is based on the GMO situation in the respective producing country.
- (b) Geographical origin:** Refers to the risk that the produce does not originate, or does not originate 100%, from the Donau Soja region. This risk is based on the geographical origin of the Donau Soja arable crops. Countries represented with regions (only one or more parts of a country are located within the Donau Soja region) carry a higher risk.
- (c) Pesticide use and desiccation practices:** Refers to risks related to the use of pesticides, considering the legal framework, the national list of approved substances and the national situation with regard to desiccation practices. This risk is based on an assessment of national sectoral legislation compared to EU legislation and other relevant documents (e.g. WHO Recommended Classification of Pesticides by Hazard<sup>1</sup>).
- (d) Legal compliance:** Refers to the risk that farmers do not comply with applicable legislation. This risk is based on 1) the Worldwide Governance Indicators<sup>2</sup> by the World Bank and 2) the Country Legal Compliance Assessment<sup>3</sup> published by the SAI Platform.
- (e) Land conversion and arable crop production in protected areas:** Refers to the risk that non-agricultural land was converted to cropland after 1<sup>st</sup> January 2008. This risk is based on 1) a land use change assessment for the relevant country in line with

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<sup>1</sup> The WHO Recommended Classification of Pesticides by Hazard, WHO, accessible online at: <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>

<sup>2</sup> Worldwide Governance Indicators, World Bank, accessible online at:

<https://databank.worldbank.org/source/worldwide-governance-indicators>

<sup>3</sup> Country Legal Compliance Assessment, SAI Platform, accessible online at: [https://saipatform.org/wp-content/uploads/2019/03/pr\\_country\\_legal\\_compliance\\_assessment\\_03.11.2019.pdf](https://saipatform.org/wp-content/uploads/2019/03/pr_country_legal_compliance_assessment_03.11.2019.pdf)

the PAS 2050-1 methodology<sup>4</sup> and 2) additional data sources where applicable (e.g. satellite assessment, literature review).

## 1.2 Risk matrix

The risk assessment shall consider the risk categories of a-e; the risk shall be assessed per country and shall be summarised as “production area risk level” (F-RL).

Countries	GMO-RL	ORIGIN-RL	PESTICIDE-RL	LUC-RL	LEGAL-RL	F-RL
Austria	1	1	1	1	1	0
Bulgaria	1	1	1	1	2	1
Croatia	1	1	1	1	2	1
Czech Republic	2	1	1	1	1	1
Germany	1	1	1	1	1	0
Hungary	1	1	1	1	1	0
Italy	1	1	1	1	2	1
Poland	1	1	2	1	1	1
Romania	2	1	1	1	2	2
Slovakia	2	1	1	1	1	1
Slovenia	1	1	1	1	1	0
Bosnia and Herzegovina	1	1	2	2	2	2
Moldova	3	1	2	1	2	3
Serbia	1	1	1	1	2	1
Switzerland	1	1	1	1	1	0
Ukraine	3	1	2	1	2	3

## 1.3 Inspection frequencies for individual farmers or farmer groups

The risk assessment based on the risk categories of a-e shall determine the frequency of inspections to be conducted by a certification body recognised by Donau Soja Organisation. For farmers or farmer groups, inspections shall be conducted at least every three years, except for farmers with an F-RL of 0 or 1 who participate in a certification system that can, upon application, be recognised as equivalent by Donau Soja. Farmers located in production areas with the highest GMO risk shall be individually certified and be subject to annual inspections.

Company type	Risk level	Inspection frequency
Agricultural producer (farmer)	F-RL 0	Inspection every 3 years
	F-RL 1	Inspection every 2 years
	F-RL 2	Annual inspection
	F-RL 3	Annual inspection

Satellite image-supported verification of freedom from land conversion is conducted based on risk as part of the integrity programme.

<sup>4</sup> Direct Land Use Change Assessment; Blonk Consultants, accessible online at: <https://www.blonkconsultants.nl/portfolio-item/direct-land-use-change-assessment-tool/?lang=en>

## 2 Risk assessment for certified companies in the supply chain

### 2.1 Risk categories

For certified companies other than farmers in the supply chain (e.g. collectors, traders, processors, compound feed producers, marketers), the risk of GM contamination shall be taken into account.

### 2.2 Risk Matrix

The risk assessment shall consider the risk of contamination of Donau Soja certified arable crops or derived products with GMOs. The risk shall be assessed for each company and shall be assigned a **company risk level** (see R 02 to R 06b, paragraph 1, for the risk levels of agricultural collectors and primary collectors [C-RL], traders [T-RL], primary processors [P-RL] and agricultural processors [A-RL]).

<b>Company type</b> Agricultural collector & primary collector; trader; primary processor	<b>Risk level</b>	<b>Definition</b>
	RL 0	Only Donau Soja arable crops are stored, traded or processed.
	RL 1	Only GM-free arable crops are stored, traded or processed; non-GM arable crops of origins other than Donau Soja may also be stored, traded or processed.
	RL 2	Only GM-free arable crops are stored, traded or processed (e.g. soya, rapeseed); GM crops of another type (e.g. maize) may also be stored or processed.
	RL 3	GM arable crops and GM processed products (e.g. meal) may also be stored, traded or processed.*

\*Only possible for oil mills and toasters if the processing lines are 100% segregated, both physically and technically; not possible for food producers

<b>Company type</b> Agricultural processor (animal keeper)	<b>Risk level</b>	<b>Definition</b>
	RL 0	Donau Soja single or compound feed only
	RL 1	Also other non-GM single or compound feed (non-GM is documented)
	RL 2	Also GM single or compound feed, but only in another farm activity (e.g. certified laying hen feed & conventional fattening pig feed); no GM feed or raw materials in the same facilities
	RL 3	Also GM single or compound feed in the same facilities, but only if appropriate measures to minimise the GM contamination risk are in place

### 2.3 Inspection frequencies for certified companies in the supply chain

The assessment of the risk of GM contamination shall determine the frequency of inspections to be conducted by independent third parties (i.e. independent certification bodies). Inspections at the level of compound feed producers and food processors shall be conducted in accordance with the standards for non-GM inspections.

<b>Company type</b>	<b>Risk level</b>	<b>Inspection frequency</b>
Agricultural collector & primary collector	C-RL 0	Inspection every 2 years
	C-RL 1	Inspection every 2 years
	C-RL 2	Inspection every 2 years
	C-RL 3	Annual inspection
Trader	T-RL 0	Inspection every 2 years
	T-RL 1	Inspection every 2 years
	T-RL 2	n.a.
	T-RL 3	Annual inspection
Primary processor	P-RL 0	Annual inspection
	P-RL 1	Annual inspection
	P-RL 2	Inspection twice a year (once unannounced)
	P-RL 3	Inspection twice a year (once unannounced)
Compound feed producer	n.a.	Conducted in combination with non-GM inspections, at least once a year
Agricultural processor (animal keeper)	A-RL 0	Inspection every 2 years
	A-RL 1	Inspection every 2 years
	A-RL 2	Inspection every 2 years
	A-RL 3	Annual inspection
Food processor through marketer	n.a.	Conducted in combination with non-GM inspections, at least once a year

## Quantity Equivalence System using “Approved by Donau Soja” soybeans

Purpose	Define the framework conditions that allow for the joint processing and/or storing of certified Donau Soja soybeans and/or products that comply with the “Approved by Donau Soja” criteria (AB-DS soybeans) (= quantity equivalence system, QES). The quantity equivalence system covers the stages from soybean primary processor to compound feed producer.
Definition	<p><u>Donau Soja (DS) soybeans</u>: Soybeans produced and certified in accordance with the Donau Soja Guidelines.</p> <p><u>Approved by Donau Soja (AB-DS) soybeans</u>: Soybeans that comply with the below specified criteria and are approved for being processed and/or stored together with Donau Soja soybeans.</p> <p><u>Quantity equivalence (QES)</u>: The quantity input of DS equals the quantity output of DS in the specified cumulative period.</p> <p><u>Segregation</u>: DS goods are being kept physically separated (segregated) from non-DS-certified goods throughout the supply chain, which means there is no mixing (as opposed to the QES).</p>
Outline	<p>1 Requirements for primary processors, compound feed producers and traders</p> <p>2 Criteria for “Approved by Donau Soja” (AB-DS) soybeans for soybean primary processors.....2</p> <p>3 Labelling.....3</p> <p>4 Period of validity and timeframe.....3</p> <p>5 Miscellaneous.....3</p> <p>6 Example: Soybean primary processor.....3</p> <p>7 Example: Soya product trader also acting as agricultural collector.....4</p> <p>8 Example: Compound feed producer .....4</p>
Status	Version 01: released by the Board on 18.12.2025

### 1 Requirements for primary processors, compound feed producers and traders

- 1.1 Soybean primary processors (R 04) wishing to process and store Donau Soja soybeans and AB-DS soybeans together, shall meet the requirements of paragraphs 1.3 and 1.4. In addition to the monthly notification of quantities of Donau Soja (in line with Requirements 04, paragraph 2.5), the primary processor shall report the quantity of processed AB-DS soybeans delivered to them and invoiced and/or internally used in the previous month.
- 1.2 Compound feed producers (R 05) and traders (R 03) also acting as agricultural collectors (R 02), wishing to process and/or store Donau Soja soya products (e.g. toasted soybeans, oil, meal, cake) as well as products resulting from the joint processing of AB-DS soybeans, shall likewise meet the requirements of paragraphs 1.3 and 1.4. The quantity equivalence system is not applicable to traders not also acting as agricultural collectors. Hence, these traders may not declare and market the products they purchased as AB-DS products as Donau Soja products.

- 1.3 Primary processors (R 04), compound feed producers (R 05) and traders (R 03) also acting as agricultural collectors (R 02) shall conclude a written Donau Soja contract with Donau Soja Organisation that allows for the joint processing and storing of products. Operations that have already concluded a Donau Soja contract with Donau Soja Organisation shall submit a written application to Donau Soja Organisation to use the quantity equivalence system.
- 1.4 Primary processors (R 04), compound feed producers (R 05) and traders (R 03) also acting as agricultural collectors (R 02) shall become members of Donau Soja Association.

## 2 Criteria for “Approved by Donau Soja” (AB-DS) soybeans for soybean primary processors

- 2.1 AB-DS soybeans shall comply with the following criteria:
- **Non-GM:** AB-DS soybeans shall comply with the “non-GM” requirement (in accordance with Requirements 04 of the Donau Soja Guidelines); compliance with this requirement shall be verified through rapid GM tests (strip tests) and PCR tests;
  - **Origin:** AB-DS soybeans shall originate, according to the shipping documents (e.g. delivery note), from the Donau Soja region as specified in the Donau Soja Guidelines<sup>1</sup>;
  - **Traceability:** The primary processor shall be obliged to arrange with their suppliers of AB-DS soybeans that Donau Soja Organisation is allowed to verify the products one step back in the value chain in accordance with Regulation (EC) No. 178/2002<sup>2</sup>.
  - **Deforestation-free and legality:** AB-DS soybeans shall be produced deforestation-free and in accordance with the relevant legislation of the country of production in accordance with regulation (EU) No 2023/1115.<sup>3</sup>
- 2.2 AB-DS soybeans must be marketable within the EU, especially with regards to pesticides. EU maximum residue levels for pesticides must not be exceeded.
- For soybeans from risk level 3 countries (e.g. BLR, MDA, UKR), the business intending to mix the soya with certified DS soya shall ensure that the marketability of the AB-DS soybeans is verified via a representative multi-residue analyses of pesticides including glyphosate (GC-MS/MS, LC-MS/MS ESI+, LC-MS/MS ESI-) for each lot delivered accordingly (mixed samples are permitted as long as they do not exceed 10 individual deliveries per farmer).
- 2.3 Upon application, existing quality assurance systems or similar standards may be recognised by Donau Soja Organisation.

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<sup>1</sup> For soybeans of Italian origin, the specific region does not have to be indicated for the beans to be accepted.

<sup>2</sup> Link to the Regulation (EC) No. 178/2002 of the European Parliament and of the Council of 28 January 2002: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32002R0178>

<sup>3</sup> Link to the Regulation (EU) No. 2023/1115 of the European Parliament and of the Council of 31 May 2023: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R1115>



### 3 Labelling

- 3.1 AB-DS products are allowed for the purpose of joint processing, mixing and trading and shall be correctly labelled as "Approved by Donau Soja" or "AB-DS" (e.g. "Soybean Meal Approved by Donau Soja" or "Soybean Meal AB-DS").

### 4 Period of validity and timeframe

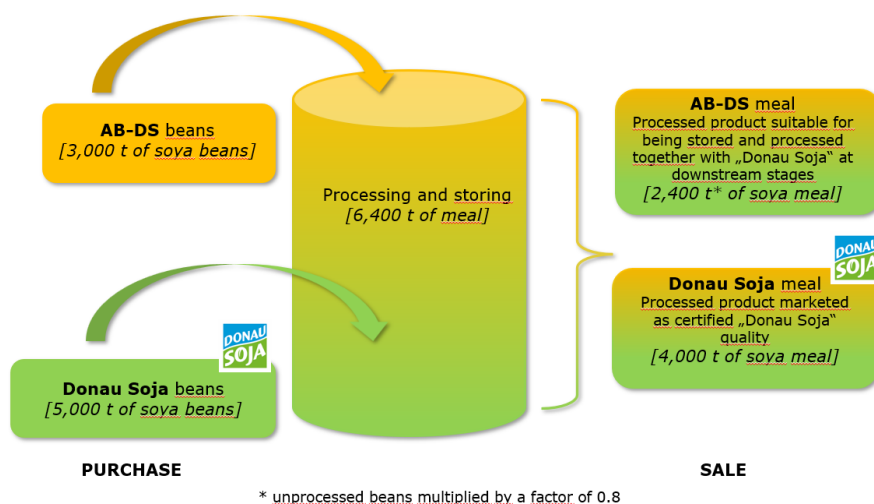
- 4.1 The cumulative period for calculating the required quantity equivalence shall be 12 months (from the start of the new harvest season 1 September to 31 August of the following year). At the end of this timespan, the balance of Donau Soja materials purchased must not fall below the equivalent balance of Donau Soja products produced and sold. After this 12-month period, any remaining physical DS-certified stock must be notified to the certification body and to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)) for carry-over. These carry-over stock amounts must be consumed by 31 December of the same year. After this date, the remaining stock must be downgraded. In contrast, any non-physical balance of goods ("credits") must be reset to zero on 31 August, in line with the cumulative period.

### 5 Miscellaneous

- 5.1 Europe Soya soybeans from the Donau Soja region as defined in chapter 01b of the Donau Soja Guidelines automatically meet the criteria applicable to Donau Soja soybeans.

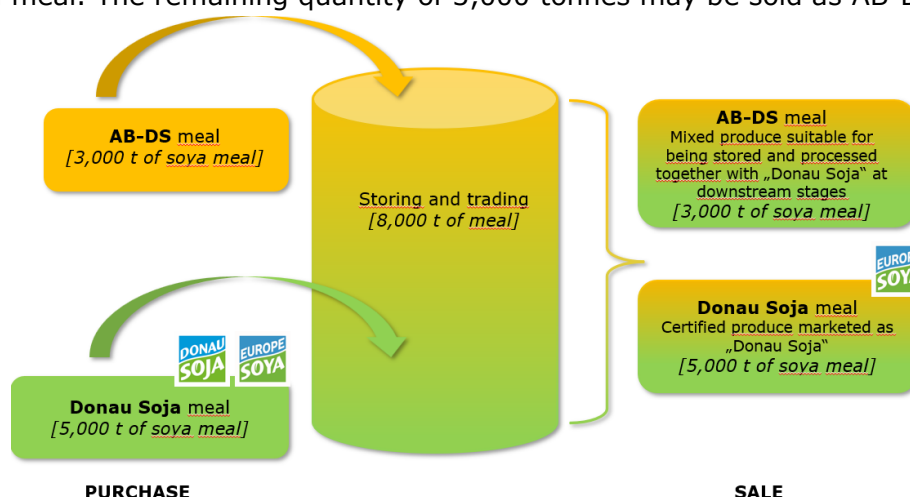
### 6 Example: Soybean primary processor

When e.g. processing 5,000 tonnes of Donau Soja soybeans and 3,000 tonnes of AB-DS soybeans, this may result in 6,400 tonnes of soybean meal (assuming a processing factor, from soybeans to soybean meal, of 0.8). However, only the proportional Donau Soja soybean meal of 4,000 tonnes may be marketed under the designation and/or logo of "Donau Soja".



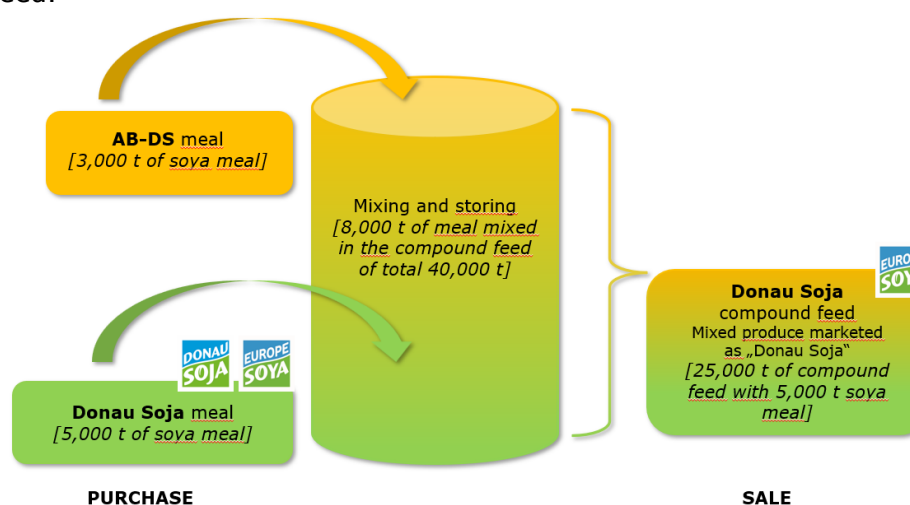
## 7 Example: Soya product trader also acting as agricultural collector

A trader e.g. buys 5,000 tonnes of Donau Soja soybean meal (or e.g. toasted full-fat soybeans, soybean oil, soybean cake). Additionally, this trader buys a further 3,000 tonnes of AB-DS soybean meal (from the joint/mixed processing of Donau Soja and AB-DS soybeans). The total quantity of 8,000 tonnes of soybean meal may be stored together. However, only 5,000 tonnes of this soybean meal may be sold as Donau Soja soybean meal. The remaining quantity of 3,000 tonnes may be sold as AB-DS.



## 8 Example: Compound feed producer

A compound feed producer buys 5,000 tonnes of Donau Soja soybean meal. Additionally, this compound feed producer buys a further 3,000 tonnes of AB-DS soybean meal. The total quantity of 8,000 tonnes of soybean meal is added to the compound feed, resulting in a total of 40,000 tonnes of compound feed (containing 20 % of soybean meal now). However, only 25,000 tonnes of this compound feed, containing 5,000 tonnes of Donau Soja soybean meal, may be sold as Donau Soja animal feed.



**ANNEX 06, Version 02**

## **Requirements for producing arable crops other than soya under the Donau Soja principles and requirements**

Purpose	Specify the requirements for declaring and/or labelling arable crops other than soya that are produced, traded and certified in full compliance with the Donau Soja principles and requirements. The requirements cover the entire value chain from the farmer producing the arable crops to the final product. This Annex can be considered as an additional module to the Donau Soja Guidelines.
Definition	Donau Soja certified arable crops other than soya: unprocessed or processed arable crops other than soya that are produced, traded and certified in full compliance with the Donau Soja principles and requirements; product consisting of or containing such arable crops Donau Soja principles and requirements: all requirements of the Donau Soja Guidelines including Annex 06
Outline	1 Requirements ..... 1 2 Directly commissioned inspections..... 2 3 Risk-based approach ..... 2
Status	Version 02: released by the Board on 29 November 2023

### **1 Requirements**

- 1.1 The Donau Soja Guidelines can be fully applied to arable crops other than soya.<sup>1</sup> Arable crops other than soya may be declared as Donau Soja if they are produced, traded, inspected and certified in accordance with the requirements of the Donau Soja Guidelines, as applicable, including this Annex.
- 1.2 An organisation or an individual company may apply for the declaration and/or labelling of an arable crop other than soya that is produced under Donau Soja requirements by submitting a written application to Donau Soja Organisation. The written application shall contain at least the following elements:
  - a complete list of all types of arable crops (e.g. fava beans, rapeseed) to be declared as Donau Soja;
  - a complete list of direct suppliers (company name, position in the value chain);
  - definition of the responsible Donau Soja approved certification body.

<sup>1</sup> Specific requirements may not be applicable to all crops (e.g. in case of no GM varieties). The determination of the applicability of the Donau Soja requirements and necessary amendments of these requirements resulting from the different conditions for arable crops other than soya shall be specified for each crop in specific technical guidelines.

- 1.3 All Donau Soja certified arable crops other than soya shall be separated both physically and technically from all other qualities in the areas of incoming/outgoing goods, storage and processing.
- 1.4 The quantitative flow of Donau Soja certified arable crops other than soya shall be monitored based on actual incoming produce and produce leaving for sale or production use (calculation of the quantitative flow). The certification body shall be entitled to request and inspect individual delivery notes and invoices.
- 1.5 The certified crop/product shall be declared as "Donau Soja [arable crop/product]" on delivery notes, etc. (e.g. "Donau Soja rapeseed", "Donau Soja rapeseed meal").
- 1.6 In addition to the declaration, the produce (packaging) itself may be labelled. The label and labelling requirements shall be agreed between Donau Soja Organisation and the respective company.
- 1.7 The basis for using the agreed declaration and/or labelling (see paragraphs 1.5 and 1.6) shall be compliance with the requirements of the Donau Soja Guidelines, as applicable, including the requirements of this Annex.
- 1.8 The agreed Donau Soja declaration (see paragraph 1.5) shall be indicated on all accompanying shipping documents (invoices and delivery notes).

## **2 Directly commissioned inspections**

- 2.1 Compliance with the requirements of the Donau Soja Guidelines, as applicable, including the requirements of this Annex, shall be verified as part of the directly commissioned Donau Soja inspections.
- 2.2 The frequency and type of inspections (e.g. regular inspection, supervisory inspection) shall be determined individually according to the risk assessment for the respective production area of the specific arable crop and the risk assessment for the respective company in the supply chain (chain of custody risk assessment) (see Annex 04).

## **3 Risk-based approach**

- 3.1 The production area risk level (**F-RL**) shall be identified for each arable crop, taking into account the risk categories according to Annex 04, paragraph 1.
- 3.2 The chain of custody risk level shall be identified depending on the company type and taking into account the risk categories according to Annex 04, paragraph 2.

## **Annex 07, VERSION 01**

# **Requirements for laboratories and GMO testing**

The minimum requirements for the GM-free production of raw materials and animal feed that must be met by laboratories and in tests

- for the purpose of Donau Soja certification, and
- according to the testing requirements laid down in the Donau Soja Guidelines are described below.

Test results for companies to be certified will only be recognised if the requirements described

here are met by the laboratories. In this respect, the Donau Soja Standard is based on the

current specifications laid down by the German Association for Food without Genetic Engineering (Verband Lebensmittel ohne Gentechnik e.V., or VLOG for short) in its guide "Guideline for Laboratories and GMO Testing – Binding Requirements"<sup>1</sup> as well as by the Austrian Platform for GMO-Free Food Products (Arbeitsgemeinschaft für Gentechnik-frei erzeugte Lebensmittel, or ARGE Gentechnik-frei for short) in its guide "Empfehlungen zu GVO-

Analysen gemäß Codex-Richtlinie zur Definition der Gentechnikfreien Produktion"

(Recommendations for GMO testing according to the Guideline on the Definition of "GMO-Free

Production" in the Austrian Food Codex, 4th edition; not yet available in English)<sup>2</sup>.

## **1 Requirements for commissioning a test**

The commissioner of the GMO test shall undertake to

- verify regularly, at least once per calendar year, that the laboratory commissioned is accredited according to the DIN EN ISO/IEC 17025 standard.

## **2 Requirements for laboratories**

### **2.1 General requirements**

- The laboratory shall be accredited according to the DIN EN ISO/IEC 17025 standard (in its most recent version) for all qualitative and quantitative GMO test parameters. This accreditation can be available either in the form of a flexible accreditation for the entire parameter or separately for all procedures carried out.
- The scope of accreditation must clearly indicate for which GMO detection methods the laboratory is accredited.

The laboratory shall participate annually in the following interlaboratory tests, achieving satisfactory results:

- An interlaboratory test for quantitative GMOs results with a satisfactory z-score (at least 75% of the results are in the  $\pm 2$  range of the z-score);
- An interlaboratory test for qualitative GMOs results (100% accurate positive or negative results) for the matrix of feed or plant-based raw materials / plant-based processed products.

### **2.2 Methodological requirements**

EN and ISO standards and protocols of the Joint Research Centre (JRC) shall be used (if available). If methods from other sources are used, the laboratory shall

1/4

verify that comparable minimum requirements are met.

#### 2.2.1 Testing process

##### Milling:

Depending on the sample matrix, the following minimum amount of sample material shall be milled completely in each case:

- feed: at least 400 g and no more than 1 kg;
- raw materials: at least 3000 grains or approx. the sample amount corresponding to this number in each case (soya: at least 700 g).

##### DNA extraction:

At least 2 DNA extractions from each sample shall be performed following milling/ homogenisation. The minimum weight of the sample shall be 2000 mg for feed, seeds, food and materials with suspected inhomogeneous distribution. In exceptional cases (for otherwise non-extractable materials), the sample weight may be as low as 500 mg.

##### PCR-tests:

Real-time PCR methods with probe technology (45 cycles) are recommended. When using conventional endpoint PCR methods, an additional confirmatory reaction (e.g. real-time PCR with probe technology, restriction test or sequencing) shall be performed in case of positive results.

#### 2.2.2 Analytical quality control

All quality controls according to the relevant EN and ISO standards shall achieve the results required by these standards. The laboratory shall ensure that the test results are not affected by inhibitory effects. If the test results deviate from the control values to such an extent that the tolerance limits set by the laboratory for deviations or quality specifications are exceeded the PCR process shall be repeated.

Procedures for the regular performance and documentation of QA measures shall be established and implemented (e.g. control charts) in order to detect systematic errors, reagent instabilities, etc. in a timely manner and to initiate appropriate measures.

#### 2.2.3 Requirements for test reports

In addition to the information required according to the EN ISO 24276, EN ISO 21569 and EN ISO 21570 standards, a test report shall contain at least the following data:

- the quantity of sample milled and sent,
- the quantity of sample used in DNA extraction,
- a precise description of the sample,
- the limit of detection (LOD in % or as copy number of target),
- the method used
- the test result,
- the measurement uncertainty of the method used (when quantitative methods are used),
- a warning if the amount of species-specific DNA is not sufficient for quantitative statements with respect to the relevant threshold value (0.1% or 0.9% GMO DNA); it is recommended to indicate the practical limit of quantification (pLOQ),
- a confirmation that the result was obtained in accordance with the requirements of the Donau Soja/ Europe Soya Standard; alternatively, this

confirmation may be provided in a separate letter sent to the commissioner of the GMO test once a year.

#### 2.2.4 Interpretation of test results – test and evaluation criteria

For each sample, a final assessment as to whether or not the sample complies with the requirements of the Donau Soja/ Europe Soya Standard for the analysed parameters shall be included in the test report. The tested GMO content, after deduction of the expanded error margin, shall be used for evaluation.

If multiple GM events (same species) are present in an ingredient, the individual values shall be summed up to a cumulative value. This cumulative value, taking into account the measurement uncertainty, shall be the most important factor for assessing exceedances of the GM content.

### 3 Requirements for the scope of analysis

Please note that the following minimum requirements for the scope of analysis do not cover all GMOs that are authorised in the EU or tolerated in feed under Commission Regulation (EU) No 619/2011. Likewise, the minimum requirements do not cover GMOs that are not authorised in the EU. In the event of an examination of the marketability and proper labelling of a feed, other GMOs will be taken into account (this includes additional GMOs authorised in the EU, additional GMOs tolerated in feed in the EU under Commission Regulation (EU) No 619/2011 as well as GMOs not authorised in the EU).

#### 3.1 Minimum requirements for raw soya materials / soya-based single-component feed

- Screening for the presence of at least the following GM soya events:  
MON40-3-2 (e.g. 35S or tNOS),  
MON89788 (e.g. CTP2-CP4EPSPS or pFMV),  
A2704-12 (e.g. PAT) and  
MON87701 (event-specific detection).

Additional screening elements may be used to determine the presence of GMOs.

In the event of positive results for the screening elements and/or MON87701, the quantity of these GMOs can be estimated, for example, by using the  $\Delta\Delta\text{ct}$  method or a comparable method. In case of multiple positive findings, the estimated individual values shall be summed up. For estimated values over 0.1%, an identification/quantification shall be carried out.

#### 3.2 Minimum requirements for compound feed containing soya

- Screening for the presence of at least the following GM soya events:  
MON40-3-2 (e.g. 35S or tNOS),  
MON89788 (e.g. CTP2-CP4EPSPS or pFMV),  
A2704-12 (e.g. PAT) and  
MON87701 (event-specific detection)

Additional screening elements may be used to determine the presence of GMOs.

In the event of positive results for the screening elements and/or MON87701, the quantity of these GMOs can be estimated, for example, by using the  $\Delta\Delta\text{ct}$  method or a comparable method. In case of multiple positive findings, the estimated individual



values shall be summed up. For estimated values over 0.1%, an identification/quantification shall be carried out.

If the analysability of the soya ingredient is limited, the practical limit of detection (LOD) shall be provided.

If positive screening results (with estimated GM levels exceeding 0.1%) cannot be adequately explained by the presence of GM soya events, further testing for the presence of GM maize and/or GM rapeseed shall be performed.

If maize is used as an ingredient:

- In addition to the aforementioned screening, the presence of the following commercialised maize varieties shall be qualitatively assessed: NK603, TC1507, MON810, MON89034

In the event of positive results, the quantity of these GMOs can be estimated, for example, by using the  $\Delta\Delta\text{ct}$  method or a comparable method that ensures that a sufficient amount of species-specific DNA is present in the sample. Regular quantification of the GMOs detected shall be carried out for values over 0.1%.

If the analysability of the maize ingredient is limited, the practical limit of detection (LOD) shall be provided.

If rapeseed is used as an ingredient:

- In addition to the aforementioned screening, the presence of the following commercialised rapeseed varieties shall be qualitatively assessed: GT73 + MS8 or RF3;

In the event of positive results, the quantity of these GMOs can be estimated, for example, by using the  $\Delta\Delta\text{ct}$  method or a comparable method that ensures that a sufficient amount of species-specific DNA is present in the sample. Regular quantification of the GMOs detected shall be carried out for values over 0.1%.

If the analysability of the rapeseed ingredient is limited, the practical limit of detection (LOD) shall be provided.

### **3.3 Other products / raw materials**

The GMO testing strategies for other raw materials, single-component feed, food and feed ingredients, intermediate products or food shall continue to be agreed upon with the laboratory commissioned, taking into account the composition and origin of these materials and products.

The VLOG and ARGE Gentechnik-frei guides listing the requirements for laboratories and testing, as amended, shall be considered equivalent and may be applied for the purpose of Donau Soja/ Europe Soya certification.



## Recognition of Soybeans from Alternative Systems

Purpose	Define the framework conditions that allow for the acceptance of raw soybeans sourced from an alternative system into the Donau Soja system.
Definition	<p><u>Donau Soja (DS) soybeans</u>: Soybeans produced and certified in accordance with the Donau Soja Standard and Guidelines</p> <p><u>Alternative system</u>: any system that has been successfully benchmarked against the Donau Soja Standard and Guidelines and is recognised by Donau Soja as covering all requirements to the necessary degree. (Note: to cover all requirements, combining two or more alternative systems may be necessary.)</p> <p><u>Successful benchmark</u>: a benchmark can only be regarded as successfully concluded if an acceptance letter has been issued.</p> <p><u>Acceptance letter</u>: following the benchmarking process, an acceptance letter detailing the conditions of acceptance is published on the Donau Soja website and the alternative system is listed on the Donau Soja website.</p>
Outline	<p>1 General requirements ..... 1</p> <p>2 Traceability ..... 2</p> <p>3 Primary Collector (R 02) accepting soybeans from alternative systems ..... 3</p> <p>4 Trader (R 03) accepting soybeans from alternative systems ..... 3</p> <p>5 Primary Processor (R 04) accepting soybeans from alternative systems ..... 3</p>
Status	Version 01: released by the Board on 18.12.2025

The purpose of this annex is to set out rules for the acceptance of raw soybeans from F-RL 0 - 2 countries produced and certified under an alternative system that has been benchmarked by Donau Soja and is recognised as covering all necessary requirements. The soybeans must be sourced from the Donau Soja region as per point 1.1 of R 01b.

Following a successful benchmarking process, an acceptance letter detailing the conditions of acceptance is published on the Donau Soja website and the alternative system is listed on the website.

### 1 General requirements

1.1 The option to accept soybeans certified under alternative systems is only applicable for raw soybeans and only available to the following scopes:

- Primary collectors (R 02)
- Primary processors (R 04)
- Traders (R 03) under certain special circumstances

1.2 Only Donau Soja certified partners may insert soybeans from alternative systems into the Donau Soja system.

- 1.3 A written application must be submitted to Donau Soja by Donau Soja certified companies who wish to include soybeans sourced from alternative systems in their DS workflow.
- 1.4 The DS-certified company has to ensure that both the supplier and the soybeans have the required, valid certifications for the respective alternative systems. Depending on the alternative system, combining multiple systems and/or fulfilling additional conditions imposed by Donau Soja to ensure adequate compliance with Donau Soja requirements may be obligatory. These conditions will be set out in the scheme's acceptance letter published on the Donau Soja website, and will be checked by the Donau Soja certification body during the audit.
- 1.5 For soybeans from alternative systems to be recognised and transferred into the Donau Soja system, they must be produced in a production area of risk level 0-2 (F-RL 0, F-RL 1, F-RL 2) and inside the Donau Soja region as per point 1.1 of R 01b. The origin of the soybeans must be substantiated via documentation e.g. in shipping documents, contracts or binding raw material specifications. Soybeans from F-RL 3 areas cannot be recognised and have to be directly Donau Soja certified in all cases.
- 1.6 The requirements for accepting soybeans from alternative systems may differ between systems and are detailed in the scheme acceptance letter.

## 2 Traceability

- 2.1 Full traceability data must be collected and provided unprompted by any Donau Soja certified company using soybeans from alternative systems to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)) and the contracted certification body via quantity declaration form including the following points:
  - name, postal and e-mail addresses of the business submitting the form;
  - name, postal and e-mail addresses of all direct suppliers of the soybeans to the business;
  - alternative system(s) the soybeans are sourced from
  - amount of soybeans per alternative system(s);
  - harvest year(s);
  - country or region of origin and, where relevant, parts thereof;
  - geolocation<sup>1</sup> of all plots of land on which the crop was produced;
  - date of incoming delivery.

Note: This data will be entered into the Donau Soja traceability system, analogous to certified Donau Soja soybeans.

- 2.2 Soybeans from alternative systems that have been inserted into the Donau Soja flow of goods in accordance with this Annex are considered Donau Soja soya and shall be labelled as "Donau Soja" / "DS" in internal documentation. They can be mixed, stored

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<sup>1</sup>Valid from the date of applicability of the EUDR (Regulation 2023/1115), at which point it shall be mandatory for non-EU farmers to provide geodata. For EU farmers, the provision of geodata is voluntary.

and processed together with other Donau Soja soybeans along the rest of the supply chain without further distinction.

- 2.3 The total quantity of soybeans sourced from alternative systems that have been processed and sold as Donau Soja shall be reported to Donau Soja ([quality@donausoja.org](mailto:quality@donausoja.org)) on an annual basis, alongside the total amount of soybeans that were sourced as DS-certified.

### **3 Primary Collector (R 02) accepting soybeans from alternative systems**

- 3.1 Donau Soja Requirement 02 are fully applicable for soybeans from alternative systems from the point of delivery to the primary collectors, except for the following where the below considerations shall be taken into account:

R 02 Point 2.1: No Donau Soja Declaration of Self-Commitment is required. However, the primary collector shall still keep an up-to-date list of all farmers delivering soybeans from alternative systems to the collector.

R 02 Point 2.2: The primary collector accepts soybeans from producers certified under alternative systems alongside or instead of Donau Soja certified soybeans.

R 02 Point 3.2: A separate quantity declaration form (analogous to the DS harvest declaration) shall be sent for soybeans that have been accepted from alternative systems into the Donau Soja system, providing not only the data requested under R 02 Point 3.2, but also the name(s) of the respective alternative system(s) that the soybeans are sourced from, as per point 2.1 of this Annex.

### **4 Trader (R 03) accepting soybeans from alternative systems**

- 4.2 For traders, it is only permitted to trade soybeans from alternative systems as Donau Soja if the benchmarking of the respective system concludes that this is appropriate. Please refer to the scheme's acceptance letter for details.
- 4.3 A trader accepting soybeans from alternative systems and transferring them into the Donau Soja system is effectively acting as a Donau Soja primary collector and will have to notify the quantities to Donau Soja as per point 2.1 of this Annex by the 10<sup>th</sup> of each calendar month for the previous month.
- 4.4 Sampling requirements are equivalent to the primary collector (R 02) requirements and may be detailed in the scheme acceptance letter.

### **5 Primary Processor (R 04) accepting soybeans from alternative systems**

- 5.2 Traceability information must be provided as per Point 2.1. of this Annex by the 10<sup>th</sup> of each calendar month for the previous month. A primary processor (A 04) also holding a certification as a primary collector (A 02) shall notify the delivered quantity only once (in their capacity as primary collector).



5.2 Donau Soja Requirement 04 remain fully applicable for soybeans from alternative systems, except for the following points where the below considerations shall be taken into account:

R 04 Point 2.5 This point is fully applicable except for the Donau Soja Declaration of Self-Commitment which is not required.

This Annex does not apply to own-use primary processors (R 04 Point 10) and any of the special cases listed under R 04 Point 11.

5.3 The Donau Soja license fee is payable for products made from soybeans from alternative systems. It is calculated based on the soya equivalent of the product volume sold as Donau Soja. The quantities are to be notified to Donau Soja through the standard notification process as per Requirements 04, point 2.5.



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*The Donau Soja Standard is owned by Donau Soja Association and available in English, German, Romanian, Serbian and Croatian language. In the case of inconsistency between versions, please refer to the English version as the official version. Current version January 2026; approved by the Donau Soja Board and Presidium on 18 December 2025; entering into force on 1 January 2026. More information: [www.donausoja.org](http://www.donausoja.org); Contact: [standard@donausoja.org](mailto:standard@donausoja.org)*