



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 Europe Soya system.
Definition	<p><u>Europe Soya (ES) soybeans</u>: Soybeans produced and certified in accordance with the Europe Soya Standard and Guidelines</p> <p><u>Alternative system</u>: any system that has been successfully benchmarked against the Europe Soya 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>
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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 Europe Soya 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 Europe Soya certified partners may insert soybeans from alternative systems into the Europe Soya system.



- 1.3 A written application must be submitted to Donau Soja by Europe Soya certified companies who wish to include soybeans sourced from alternative systems in their ES workflow.
- 1.4 The ES-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 Europe Soya 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 Europe Soya 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 Europe Soya 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 Europe Soya certified company using soybeans from alternative systems to Donau Soja (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;
- geolocation¹ of all plots of land on which the crop was produced;
- date of incoming delivery.

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

2.2 Soybeans from alternative systems that have been inserted into the Europe Soya flow of goods in accordance with this Annex are considered Europe Soya soya and shall be

¹Valid 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.



labelled as "Europe Soya" / "ES" in internal documentation. They can be mixed, stored and processed together with other Europe Soya 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 Europe Soya shall be reported to Donau Soja (quality@donausoja.org) on an annual basis, alongside the total amount of soybeans that were sourced as ES-certified.

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

- 3.1 Europe Soya 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 Europe Soya 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 Europe Soya 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 Europe Soya 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

- 4.1 For traders, it is only permitted to trade soybeans from alternative systems as Europe Soya if the benchmarking of the respective system concludes that this is appropriate. Please refer to the scheme's acceptance letter for details.
- 4.2 A trader accepting soybeans from alternative systems and transferring them into the Europe Soya system is effectively acting as a Europe Soya primary collector and will have to notify the quantities to Europe Soya as per point 2.1 of this Annex by the 10th of each calendar month for the previous month.
- 4.3 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

- 5.1 Traceability information must be provided as per Point 2.1. of this Annex by the 10th 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 Europe Soya 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 Europe Soya 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 Europe Soya 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 Europe Soya. The quantities are to be notified to Donau Soja through the standard notification process as per Requirements 04, point 2.5.