STANDARD FOR PRODUCTION PROCESSES AND PRODUCTS

„WITHOUT GENETIC MODIFICATION“

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With the release of this standard expires its previous version.

Transition period for the recertification**: The validity of this standard is from the date mentioned above. **For the implementation of new version of the standard the transition period 6 months is set - after the release of the revised version of the standard (see chapter 1.6).

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1 Introduction and Legislative Requirements

1.1 *Creation of System and Mark*

This Standard concerning feedstuffs made without the addition of genetically modified organisms (hereinafter referred to as the “Standard”), and the below shown marks were developed in response to the requirements of customers and are in compliance with European legislation and harmonised legislation of the Czech Republic. The Standard defines principles and conditions for identifying non-genetically modified products across the food supply chain.

The “Non-GMO” mark identifies products made without the use of genetically modified feed, see the “Non- GMO Standard”. The “Non-GMO” mark may only be used by the certified organisation for products verified for compliance with this standard. When the certification of an entire establishment is carried out and all products have identical inputs, the certification shall include all products produced from verified inputs. The scope of certification for a particular company is specified on the issued certificate in the “subject of certification”. Products of a non-food nature will be marked with the words “Produced without genetic modification – (“Non-GMO”) and the mark, see fig. 2, and food products of animal origin will be marked with the words “Produced without genetically modified feed” – (“Non-GMO”) and/or the mark, see fig. 1.

This “Non-GMO” Standard focuses on the implementation and monitoring of risks in order to achieve compliance with the requirements for “Non-GMO” products under the best technical conditions possible.

“Non-GMO” standard trademarks

The “Non-GMO” mark in Czech and English with a monochromatic green design was registered and published on April 29, 2019 by the European Union Intellectual Property Office – EUPIO.

EUTM is available for certified companies on the standard’s website at www.bezGMO.cz in the standard’s documents section.

Registration information is available here:

https://euipo.europa.eu/eSearch/#details/owners/972889

Depiction of registered marks:

Marks used for the purpose of the “Non-GMO” Standard:

For food products (such as milk and multi-component dairy products, meat, meat products, eggs etc.). Use of the mark is governed by current version of the logo manual, which is available on the system's website. Here you can also download the approved graphic designs of the logo for use by certified entities. If the “Non-GMO” logo is changed, packaging with the original printed logo can be used until stocks are processed.

Others in different language versions are issued with the approval of the standard owner and published on the website of the “Non-GMO” standard:

Fig. 1 : Logo of the “Non-GMO” Standard for food (e.g. milk) – Czech and English version

For other products, feedstuffs and raw materials: *fig. 2: Logo of the “Non-GMO” Standard for other products and services – Czech and English version*

1.2 *Conditions for Use of the Non-GMO Mark*

Every company (operator) meeting the relevant legislative requirements must mark products containing genetically modified organisms in compliance with applicable valid legislation, Regulation of the European Parliament and of the Council (EC) no 1829/2003 and 1830/2003.

A company (operator) wanting to use the “Non-GMO” mark must credibly prove that its products meet the requirements of this mark and request an independent audit for verification of compliance pursuant to this standard. Requirements for granting the “Non-GMO” certification/mark differ depending on the field of activity of the applicant and the field of application of the product, see Annex 17 “Registration Form for “Non-GMO” Certification”, template.

The applicant must fill out a questionnaire and attach the relevant documents showing compliance with the Standard requirements, after which an audit will be performed on the spot by an independent certification authority, on the basis of which the applicant will be certified and granted the right to use the “Non-GMO” mark according to the Standard.

To maintain the validity of the certificate, periodic audits (reviews) of compliance with the requirements of this standard are performed pursuant to the criteria defined in Chapter 7 hereof of the standard according to established criteria for individual types of establishments and products.

Compliance with the conditions for use of the “Non-GMO” mark is inspected by approved certification authorities. Every inspected company must be able to submit valid documents as proof of compliance with this standard.

If the audited entity disagrees with the audit conclusions, the entity may appeal to the certification authority, which will then inform the owner of the standard (SKK). In cooperation with the certification authority, the owner of the standard shall review the documentation of the specific audit. Depending on the specific situation, a new audit may be carried out by the certification authority, focusing on a particular contradictory area. This audit may be conducted with the participation of a representative of the standard owner (SKK).

1.3 *Legislative Documents*

Legislation of the European Community:

- Regulation of the European Parliament and of the Council (EC) no 1829/2003 of 22 September 2003 on genetically modified food and feed
- Regulation of the European Parliament and of the Council (EC) no 1830/2003 of 11 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC
- Regulation of the European Parliament and of the Council (EC) no 178/2002 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 (Art. 18 sec. 1)
- Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
- Regulation (EC) No 1331/2008, No 1332/2008, No 1333/2008 and No 1334/2008 of 16 December 2008 on food additives, as amended
- Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, as amended
- Regulation (EU) No 68/2013 of 16 January 2013 on the Catalogue of feed materials, as amended
- Regulation (EC) No 183/2005 of the European Parliament and of the Council of 12 January 2005 laying down requirements for feed hygiene, as amended
- Regulation (EC) No 1831/2003 of the European Parliament and of the Council on additives for use in animal nutrition
- Commission Regulation (EU) no 619/2011 of 24 June 2011, laying down the methods of sampling and analysis for the official control of feed as regards presence of genetically modified material for which an authorization procedure is pending or the authorization of which has expired
- Commission Regulation (EU) No 691/2013 amending Regulation (EC) No 152/2009 as regards methods of sampling and analysis, as amended
- Council Regulation (EC) no 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91

National Harmonised Legislation

- Act no 252/1997 Coll., on agriculture, in the wording of the amended Act no 371/2016 Coll., as amended
- Act 110/1997 Coll. on foodstuffs, Decree 324/1997 Coll. on methods of labelling foodstuffs, as amended
- Act No. 153/2000 on the use of genetically modified organisms, as amended
- Decree 374/2000 Coll. on detailed conditions for the use of genetically modified organisms and products, as amended
- The Feed Act no. 91/1996 Coll. as amended
- Act No. 209/2019 Coll. amending the Feed Act no. 91/1996 Coll. as amended
- Act no 78/ 2004 Coll., on the use of genetically modified organisms and genetic products of 22 January 2004, in the wording of Act no 371/2016 Coll., as amended
- Decree no 89/2006 Coll., on more detailed conditions of growing genetically modified variety, in the wording of Decree no 392/2016 Coll., as amended
- Decree no 209/2004 Coll., on more detailed conditions of the use of genetically modified organisms and genetic products, in the wording of Decree no 372/2016 Coll., as amended
- Decree no 415/2009 Coll., on specification of the requirements for sampling and methods of publication of the methods of laboratory testing of feed products
- Methodological instruction of the Ministry of the Environment of the Czech Republic Sampling for the Purpose of Specification of Presence and Proportion of GMO and Derived Products

1.3.1 European Obligation to Mark Products Containing GMOs

The basic requirement for feed and food ingredients to be marked as “Non-GMO” is that these products or components do not fall under the labelling requirements pursuant to Regulations (EC) nos. 1829/2003 and 1830/2003 if the following conditions are met:

- The GMO content limit of 0.9% per feed ingredient / feed (feed / food) is not exceeded
- The presence of GMO content is "accidental or technically unavoidable"

Contamination with an approved GMO content of <0.1% is generally considered "technically unavoidable" or "accidental".

Contamination present in the range of > 0.1% and ≤ 0.9% is considered to be satisfactory if the company has taken measures to minimize GMO contamination risk and has demonstrably implemented them. Measures must be implemented in accordance with the requirements of Article 7.1.9.

1.3.2 Obligation to Label Food

For a food ingredient to be allowed to be marked as “Non-GMO”, this ingredient may not be subject to the labelling obligation pursuant to the Regulations of the European Parliament and of the Council nos. 1829/2003 and 1830/2003. Ingredients, additives, and processing aids containing, consisting of, or produced from GMOs shall not be used in the production of “Non-GMO” food. If the required non-GMO ingredients are not demonstrably available on the market, those produced using GMOs may also be used. This is based on the Community’s list of food additives approved for use in food and the conditions of use issued by the EU Commission pursuant to Regulation (EC) No 1333/2008.

1.3.3 Obligation to Label Feed

Feed used in the “Non-GMO” system may not contain products or ingredients that must be marketed under compulsory GMO labelling pursuant to Regulations (EC) nos. 1829/2003 or 1830/2003, i.e. products and components exceeding the permitted limit of GMO additives of 0.9 % for technically inevitable or accidental contamination must be labelled by the manufacturer and may not be used in non-GMO production.

The certification authority must verify whether:

- A contract or agreement has been concluded with the supplier in order to prevent the presence of GMOs
- Appropriate measures have been taken for spatial or temporal separation of GMO and Non-GMO products (e.g. cleaning, rinsing, transport etc.)
- Preventive measures are established for goods imported from third countries where the labelling obligation pursuant to EU requirements does not apply (contract, certificate, analyses, sampling plans etc.)
- The frequency of nonconforming GMO analyses results is minimal

Additives listed in the list of additives in Regulation (EC) No. 1831/2003 containing, consisting of, or produced from GMOs shall only be used in feed under the "Non-GMO" regime provided that they are not subject to labelling under Regulation (EC) No. 1829/2003 or No. 1830/2003. The permitted amount of GMOs according to EC Regulations 1829/2003 and 1830/2003 is 0,9% per ingredient; products meeting the above limit need not be labelled by the manufacturer.

1.4 *Use of the “Non-GMO” Mark*

This Standard focuses on food producers and processors (such as dairy product suppliers), their ingredients, feed producers and sellers, and agricultural facilities and logistics companies who wish to mark their products with the “Non-GMO” logo.

The condition for the use of the unified “Non-GMO” mark is certification, whose implementation according to this Standard and the use of the “Non-GMO” mark on the issued certificates are stipulated in the contract between the certification authority and “Spolek pro komodity a krmiva (Commodities and Feed Association)” (SKK), the owner (holder) of the “Non-GMO” mark and certificate. The “Non-GMO” mark (see Figs. 1 and 2) is a verbal and figurative mark (protected by copyright and by trademark).

A food or product marketed and certified pursuant to the “Non-GMO” Standard may only use the “Non-GMO”

Standard logo seen on Fig. 1, or the “Non-GMO” Standard logo seen on Fig. 2. It can only be used with approval by the “Non-GMO” Standard owner and the mark holder, i.e. the SKK and the “Non-GMO” certificate on the basis of the conditions for use of the “Non-GMO” mark. The mark and the text must comply with the valid logo manual for the “Non-GMO” mark according to this Standard.

1.4.1 Standard Updates and Amendment Approval

The owner of the Standard, “Spolek pro komodity a krmiva” (SKK) updates the Standard after every amendment of the related legislation. The Standard amendments are consulted with the relevant professional associations within the scope of the Standard’s applicability.

1.4.2 Control Mechanisms for Maintaining System Integrity

To maintain the integrity of the system and thus the credibility of the certificate, independent inspections are performed by the owner of the standard or a person authorized by him. The certified company may or may not be notified of the supervision. This decision depends on the owner of the standard. Supervision is performed on a selected sample of organizations at least once every 2 years, or in the event of a complaint regarding the seriousness of a specific complaint.

Verification of integrity - Integrity audits include various measures designed to ensure the quality and proper implementation of the Non-GMO standard. The verification is performed on the certified organization’s premises, where compliance with the requirements of the Non-GMO standard is verified.

During the performed integrity audit, the certification authorities and their auditors are also inspected. During the audit, the representative of the SC or a person authorized by him is entitled to inspect the documentation of the certified company in the same way as during an audit, including sampling, if relevant.

Inspections can be performed in all areas of Non-GMO certified organizations and with suppliers involved in Non-GMO certification, if any. In the case of the superior coordinator, there is also an audit of a selected sample of suppliers.

The performance of an integrity audit in the case of the superior coordinator and his supplier must always be communicated and coordinated with the superior coordinator, as the SC is the certificate holder.

Inspections may be performed with or without prior notice of the certified organization.

If notice of an integrity audit is sent in advance, the certified organization cannot reject the audit. However, within 7 days of receiving the information from the SC or his representative, it may respond with a request for a different date for the performance of the integrity audit, and the postponement of the date must be duly and credibly justified. The proposed date must be no later than 30 days from the originally announced date of the integrity audit. The SC will send a decision on the approval or rejection of the change in the date of the integrity audit. If the request for a different date is approved by the SC, the SC or an authorized person will send the new date of the integrity audit.

A request to change the date must always be announced to the SKK.

An organization that elects certification in accordance with this standard and enters into a contract with a certification authority to perform the audit automatically agrees that an integrity audit may be performed in the organization by the owner of the standard or by a person authorized by him.

1.5 *Scope of “Non-GMO” Standard Certification*

Feed: loose and granulated feed mixes (including complex and supplementary feed), premixtures, feed ingredients, additives, bulk feed

Food: plant and animal food

Agricultural, animal production: cattle, dairy cows, pigs, layer hens, broilers, turkeys etc., plant and animal products.

Individual links in the certification chain:

- **Production / processing**: food (dairy products, sugar, honey, meat, other food products, etc.), single-ingredient or mixed feed, treatment of single-ingredient feed, e.g. extrudates, rapeseed meal (expellers), vegetable oils

- **Trade, storage trade**: trade in bulk single-ingredient and mixed feed, trading companies storing bulk or packaged (bagged) single-ingredient or mixed feed handled (subsequently packed, divided or otherwise treated) and transported to customers
- **Traders who do not handle the product** - Traders who trade products in the form of intermediation with or without transport. This includes traders who do not handle the product and deliver it in a "supplier - customer" form. This category includes trading companies that trade in packaged or unpackaged raw materials, feed and products.
- **Service providers, e.g. storage** - Service providers, e.g. providing storage or similar services for their customers, e.g. trade organizations, carriers, etc.
- **Transport**: Transport and potential trade in single-ingredient and mixed feed - in bulk
- **Animal production**: livestock operations - production of raw milk, meat, eggs, etc.
- **Seed production**: seed propagation, treatment and marketing companies

For all the above-mentioned links in the chain, the general conditions of the standard set out in Section 7.1 apply; for specific links in the chain, the requirements are further specified or amended in other subsequent chapters of the standard.

This Standard does not apply to products of environmental agriculture and the Standard logo cannot be used for them.

Audit periods are listed in Article 5.6

1.5.1 Types of Certification

Enterprises in the supply chain of raw materials and products can be certified according to the "Non-GMO" Standard as follows:

- Individual company certification – see Article 4.6;
- Certification of a group of companies that is performed on a sample of operations - sample size according to Article 4.6.2 -Sampling of other links in the supply chain;
- Certification of processors – e.g. dairy factories in the regime of the Superior Coordinator - sample size according to Article 4.6.1 and additional articles - Audit intervals - livestock production within the certification of the superior coordinator.

Establishments / farms supplying raw materials to processors, e.g. milk for production (dairy factories) can be certified under regime of the superior coordinator or certified separately (see Article 5.3).

1.6 *Transition Period During the Issue of a new Version of the Standard*

When a new version of the Standard is issued, the “Transition Period” for companies in re-certification commences on the effective date of the new standard. This standard is effective from the date stated above, and the issue of the new standard supersedes the previous issue of the standard. The transition period for already certified organizations shall also begin on this day. For the implementation of the new version of the standard, **a transition period of 6 months from the issue of the revised version of the standard is established**. Organizations undergoing recertification during the 6 months of the transition period may be recertified according to the previous version of the standard if they do not wish to be certified under the new edition of the standard. Organizations undergoing recertification after the transition period must be audited according to this valid version of the standard without exception.

After the transition period, the original standard shall no longer valid be valid. Newly certified companies must be certified according to the latest valid version of the standard at the time of certification, regardless of whether the new edition of the standard is in the transition period.

1.7 *Terms, Definitions and Abbreviations*

auditor	Person appointed by a certification authority to perform a corporate audit
BRC, BRC Global Standard	Certification standard with a unified quality evaluation system within the whole food supply chain http://www.brcglobalstandards.com/
“Non-GMO” certificate	Certificate issued by the collaborating certification authority on the basis of successful compliance with the “Non-GMO” Standard requirements
FSMS, Food Safety Management System	Food quality certification standard http://www.fssc22000.com
Genetically modified organisms (GMO)	Organisms, with the exception of human beings, whose genetic material has been changed in a manner not achievable by a natural process of mating and/or natural recombination (according to the definition in EP and R Directive 2001/18 and Act 78/2004 Coll.)
GMP+, Good Manufacturing Practice	Good manufacturing practice for feed production, see http://www.gmpplus.org, compatible with QS system, and GMP+B4 good practice for transport of agricultural commodities and feed, and raw materials for feed production
GTP, Good Trading Practice	Good trading practice defined in the COCERAL Code for trading crops, oil plants, leguminous plants, and plant feedstuffs http://www.coceral.com
IFS, International Food Standard	A common standard with a unified quality evaluation system across the supply chain
International Sustainability at Carbon Certification	ISCC EU, international certification of biomass and bio-fuel sustainability, www.iscc-system.org, *RedCert etc.*
Animal category	Animals distinguished by breed type (meat x dairy cattle etc.)
Feed	Substances, products and complements processed, partly processed or raw used for oral feeding of animals, bulk feed
Feed subject to compulsory marking	Feeds which must be identified as “genetically modified” pursuant to Regulations (EC) nos. 1829/2003 and 1830/2003
Risk monitoring in manufacture of “Non-GMO” products	A process of risk monitoring, their suppression for achievement of compliance with the requirements for “Non-GMO” products under optimum technical conditions in a unified manner with the application of technical standards
Superior coordinator (SC)	A food producing entity coordinating their manufacture with contracted enterprises (suppliers – raw material producers, such as barrel milk, agricultural commodities etc., and other raw materials (ingredients) for food production)
Remedial measure	Actions that will eliminate the cause of an error, defect or another undesirable situation in order to prevent recurrence or reduce frequency of recurrence
Food	All substances and products in partly processed or unprocessed form for human consumption
Producer/contractor	Legal entity producing for the SC (meat, milk, eggs, agricultural commodities etc.)
Operation unit	Parts of an agricultural plant physically separated (different stables, feed stores etc.)
Mixing equipment	Stationary or mobile device for feed mixing (production of feed mixes, mobile mixers, fodder carriers)
Contracted company	Supplier, raw material producer supplying food on a contractual basis (such as raw milk, agricultural commodities and other raw materials (ingredients)) to a SC for the SC´s final production of “Non-GMO” food
Exchangeable GM feed/raw materials	Feed is exchangeable if it can be also be used for “Non-GMO” milk production (such as “Non-GMO” soy meal in market production of “Non-GMO” milk and GM soy meal also used in milk production for calf nursing)
Food processing	Substantial change of the original product (by heating, smoking, maturation, drying, extrusion etc., or a combination thereof), see EC Regulation 852/2004. These can contain ingredients needed for their production or the development of special features
Logistics/transport	Transport activities of the raw materials and compound feed without storing or any other manipulation with material.
Trade, storage	Activities of trade and / or storing raw materials or compounded feed without providing own transport. Transport is provided by external carrier company.

2 Certification

The “Non-GMO” mark can only be used after successful completion of a certification audit of compliance with the requirements of this Standard, applicable valid EC and national legislation. The scope of the audits depends on:

- Complexity and type of the manufacturing process
- Raw materials uses, which may be a source of GMO
- Size of the company and the number of its suppliers

The frequency of the audits is determined in chapter 4.6. Scope and Validity of Non-GMO Certificate, unless otherwise specified by the owner of the standard or certification body with regard to the risk. The performance of the certification and recertification audits is according to the chapter 4.6 of the standard, including sub-articles.

2.1 *Certificate Validity*

The issued certificates are always valid for at least 1 year, while:

1. When performing the initial certification audit (issued certificates) from 1.1. to 30.6. the are **valid until 30.6. the following calendar year**.
2. When performing the initial certification audit (issued certificates) from 1.7. to 31.12. the issued certificates are **valid until 31.12. the following calendar year**.

When the recertification audits are planning, the date for planed audit is the date of the initial certification audit.

The audit of the certified company must be performed within the validity of the certificate, in a period close to the last performed audit.

2.2 *Application for Certification*

The application for certification is submitted to the owner of the Non-GMO standard on the form, see Annex no. 17 Registration form for "Non-GMO" certification. The application is sent to the following email address: standard@bezgmo.cz.

Registration for certification can also be done through an approved certification authority, see the list of certification authorities listed on the website of the standard at https://www.bezgmo.cz.

2.3 *External Certification*

The fundamental requirement is evaluation of compliance with the rules of the “Non-GMO” Standard according to the defined criteria commonly specified in standards and standard documentation. This Standard is available to all concerned parties.

The certification authorities performing audits, evaluations and monitoring of compliance with this “Non- GMO” Standard must be validly accredited pursuant to ČSN EN ISO/IEC 17065 for product certification (e.g. certification of organic products, organic food and processes of their manufacture) and must be authorised by the “Non-GMO” Standard owner, the SKK. The auditors must comply with qualification requirements, see chapter 3.2.

2.3.1 Compliance with Requirements and Certification

To meet the requirements of the Standard, the manufacturer produced food or feed marked as “Non-GMO” is obliged to provide evidence of compliance with the legislative criteria. A trader in food and feed marketing products is responsible for appropriate product identification in accordance with valid legislation.

If the direct supplier is not the manufacturer of the food, food ingredients or processing aids, or feed and feed additives, he is obliged to provide evidence of the previous processing or manufacturing level in the production chain. Evidence may consist in certification pursuant to the “Non-GMO” Standard or a valid declaration of the supplier/manufacturer, see Annex 2.

If a food product or its ingredient of animal origin is marked “Non-GMO”, the producer must prove the right to this marking by allowing an audit pursuant hereto and proving the minimum feeding period pursuant to chapter 2.5.2 with suitable non-GMO feed, see chapter 2.5.3, for all levels between the food manufacture and marketing.

Traders who store feed or raw materials for a transitional period, bag or otherwise handle products are also included in the certification system and must be certified according to this standard. Everyone must ensure the trackability (traceability) of a particular product. Evidence may be provided in the form of the "Non-GMO" Standard or a valid supplier/manufacturer declaration, see Annex 2. If transport carriers that are not certified to this standard are used for transport, the carrier's customer must ensure that the carrier applies appropriate measures to prevent contamination of operations without GMO transport. This is evidenced with the carrier's declaration, see Annex 21.

Traders who only intermediate product sale and do not handle the product in any way, or who only deliver bagged or otherwise packaged goods, must also be Non-GMO-certified and must, among other things, ensure that transport organizations are certified or apply measures against contamination in the transport, they provide for the customer - see Annex 21 for the carrier 's declaration.

2.4 *Options of Combined Audit and Acknowledgement of Certification of other Systems*

This Standard may be audited in combination with other standards with demonstrable synergic effects, which may be used to describe the “Non-GMO” Standard – e.g. quality assurance systems (QS) such as ISO 9001 together with HACCP, GMP (good manufacturing practice), certifying the health safety of feed and food production and GTP (good trading practice) proving non-existence of health risks of produced food and feed, or GMP+, IFS and BRC, and systems proving sustainability of agricultural production, i.e. ISCC EU and similar systems documenting welfare (GLOBALG.A.P., environmental certifications with valid environmental certificate pursuant to the Regulation (EC) 834/2007, national welfare regulations).

This Standard therefore complies with the principles of the national legislation of the Czech Republic in the area of non-existence of health risks of production, compliance with sustainability principles, principles of environmental agriculture and welfare in farm animal breeding.

Carriers certified for non-existence of health risk of transport, such as QS or GMP+ B4, assure prevention of contamination by previously transported GM products, and if such carriers require certification pursuant to the “Non-GMO” Standard, this may be performed in a reduced scope together with QS or GMP+B4 certification.

Thus, in the context of certification pursuant to this Standard, only those aspects specific for the “Non-GMO” Standard may be audited in a reduced scope, as the Standard fully uses and recognises already established quality management systems of the certified companies. Information about certification pursuant to the mentioned standards must be submitted by the applicant before the audit and documented with a valid certificate or another alternative document.

On the basis of the submitted application and system documents the standard owner may approve certifications pursuant to other standards for the “Non-GMO” area with regard to compliance with the specific requirements of the “Non-GMO” Standard. This can be evidenced by the wording of the certification standard or by the extension of another certification scheme, for example.

2.5 *Conditions for Certification*

2.5.1 Company Description

The applicant for certification must prepare a description of the company with regard to the production category, see annexes 5-8. The company description is a basic document enabling the acquisition of the necessary documentation, records and entry for the risk analysis of “Non-GMO” products. Annexes 10 and 15 for milk producers cooperating with the superior coordinator (SC) is the basic information and risk analysis of the certification applicant. The company description must be available during an audit and kept up-to-date.

The certification applicant always fills out Annex 17, Registration Form for “Non-GMO” Certification, according to its place in the supply chain (the certification authority may use its own template containing adequate information according to Annex 17). The registration form is the basis for planning and conducting the certification/recertification audit. The registration form is verified by the auditor during certification with regard to planning the audit and determining its scope.

2.5.2 Minimum Feeding Time of Livestock

Before marketing a food product of animal origin (e.g. milk, poultry meat, eggs) with the “Non-GMO” mark, the producer must comply with the below specified periods of feeding the respective animal types exclusively with products “without genetic modification”, which must also be considered when the animals are purchased:

Animal species	Period
Horses and cattle (including buffalo and bison species) for meat production	12 months + min. ¾ of their life
Small ruminants	6 months
Pigs	4 months
Dairy cattle, milk-producing animals	3 months
Poultry for meat production placed in fowl-houses before 3 days of age	10 weeks
Poultry for meat production with a feeding period shorter than 10 weeks	From birth throughout their lifetime
Poultry for egg production	6 weeks
Other animal species	“Non-GMO” feed from birth

Source: German legislative act executing EC legislation on genetic engineering, Art. 58 V of 31/08/2015 I 1474 (http://www.gesetze-im-internet.de/eggentdurchfg/) and State of play in the EU on GM-free food labelling schemes and assessment of the need for possible harmonisation, Final report, p. 37, and adapted text to specific conditions of breeding in the Czech Republic.

The transition to feeding with “Non-GMO” feed is documented by the producer before the first launch on the market, including the purchase of animals after transition to “Non-GMO”.

2.5.2.1 Minimum Feeding Time for Purchased animals

The minimum feeding period also applies to animals purchased from organizations that are not certified according to the "Non-GMO" standard or another recognized standard. In the case of the purchase of animals, it must be provable by a valid certificate or a declaration in the case of suppliers under the SC’s regime that the animals come from a “Non-GMO”-certified farm. If this is not proven by the supplier, a transition period must be applied, see the table above, and corresponding records must be available on the application of the transition period, e.g. in the animal register.

2.5.3 Feeding Pursuant to “Without Genetic Modification“ Principles

According to the “Non-GMO” Standard only feed “without genetic modification” can be used for production of food or food ingredients of animal origin “without genetic modification”. Before transition to this type of animal feeding, the farm usually contains contamination and feed residues that may contain GMO, which must be systematically removed with the performance of risk analyses of all processes and contamination source monitoring:

- Contamination by feed with compulsory GMO marking
- Contamination with in-house grown feed (i.e. whether the farm has assured their growing “without genetic modification”)
- Contamination introduced by other entities or processes in the establishment

The producer must specify, implement and document measures eliminating the risk of contamination and introduction of GMO feeds, such as thorough cleaning of all instruments, storage rooms, mixing equipment, transport means etc. that are in contact with feed.

If the operation unit or part of the operation alternates between feeding with Non-GMO and GMO feeds, then separate storage of residual GM feeds must be assured and documented, and subsequent “Non- GMO” product contamination must be prevented. Removal of GMO residues during the cleaning of equipment and other necessary measures must be implemented before every switch to “Non-GMO” feeding, and analyses must be performed for the presence of GMOs.

If it is found that animals were fed with GMO feed during or after the minimum feeding period, the minimum Non-GMO feeding period must be repeated from the beginning, see the table in chapter 2.3.2. If the feed used

was subject to the compulsory GMO labelling but was not labelled as such, the residues must be removed or used outside the Non-GMO production immediately. Food products already placed on the market (such as “Milk without genetic modification”) need not be withdrawn.

The seriousness of the offenses is investigated by the certification authority according to the following factors:

- Awareness of the farmer about feed labelling and care during feed acceptance
- Fed quantity of the incorrectly declared feed and the level of GMO in the feed
- Period of feeding with the incorrectly declared feed

Contamination with a GMO content of <0.1% is generally considered "technically unavoidable" or "accidental".

If contamination between 0.1% and ≤ 0.9% is present in single-ingredient or mixed feed, it is only considered to be satisfactory if the farm has adopted and demonstrably implemented measures to reduce GMO contamination risk. Measures shall be implemented in accordance with the requirements of Article 7.1.9.

If contamination is demonstrated in the amount of > 0.9% in single-ingredient or mixed feed, the feed is considered GMO and must not be fed on a certified farm.

2.5.4 GMO Feeding at certain stage of animal’s life and transition to Non-GMO feeding

Some categories of animals can be fed with GMO feed at some stage in their lives. Prior to production or delivery in the Non-GMO, shall be fulfilled transition period, according to Article 2.5.2. When is feeding in certain animal life period changed from GMO to non GMO feeding, shall be fulfilled requirements of Articles 2.5.3 and 2.5.4 and transition have to be always verified by analysis for the presence of GMOs. The organisation shall document when the animals were transferred to the Non-GMO feeding (internal records about transition period).

If compliance with the transitional period is not met or is not possible to proven it, the delivery cannot be made under non GMO certification and the transition period have to be repeated - in the same way as is when is the change of GMO and non GMO feeding (Article 2.5.4.2).

2.5.5 Elimination of Mixing and Confusion

2.5.5.1 Product Manufacture and Handling

If a company handles GMO and Non-GMO products concurrently, documented and tested measures based on risk analysis must assure prevention of product contamination or confusion. Internal inspections are verified by an audit.

2.5.5.2 Feeding with Non-GMO and GM Feed

If the farm/ **animal production** feeds other animals with GM feed concurrently with Non-GMO feed, or if GM plants are grown in the are, there is an increased risk of GMO introduction and contamination by feed, tools, means of transport, dust etc., and the producer must implement documented protective measures.

It is strictly prohibited to simultaneously feed the same animal categories with GMO and Non-GMO feeds within the same stable (in the same location), with the exception of the use of non-confusable feed (such as special feed for young hens and egg laying chickens).

The producer must have completely separated areas of the manufactory where the feed is separately stored and handled with absolute elimination of mutual confusion or contamination by GM products (e.g. by pig feed where dairy cows are Non-GMO fed (soy meal).

Farms/animal production producing in-house Non-GMO and GM compound feed in their own mixing equipment (feed carrier) for the preparation of a complete feed ration (TMR) for feeding animal categories with "non-GMO" feed, as well as for feeding animal categories with feed containing GMO feed, must apply anti-contamination measures.

The organization must document the measures to avoid contamination with GMO feed and demonstrably document the applied measures (e.g. with records in operating logs).

Operators of mobile (in-house mobile mixing equipment, feed carriers, etc.) and stationary devices (in-house mixer of compound feed) for feed production making both GM and Non-GMO feed within the same facility must perform rinsing and cleaning to prevent the introduction of GM organisms into Non-GMO feed, document the measures and check their effectiveness with analyses according to Article 6.2 of the Standard.

If the company is part of the superior coordinator, the specified measures are verified in cooperation with the superior coordinator, who documents the measures, collects samples and performs an analysis for the presence of GMOs.

For a transition to “Non-GMO” for the operation of mobile or stationary feed production facilities on a commercial basis, the requirements of Art. 2.5.6 and sample collection according to Art. 6.2 apply.

2.5.6 Transition to “Non-GMO” for Feed Production

Operators of mobile and stationary feed production facilities have to clean raw material containers, raw material transport routes, mixing equipment and related technology, compound feed transport routes and final compound feed containers and manual and handling equipment incl. internal transport technology. The performed cleaning shall be documented in accordance with Annex 18.

2.5.7 Requirements for Transition to “Non-GMO” in Transport, Storage and Processing

The operator must clean the production technology (including incoming, expedition and transport routes), means of transport (loading area), warehouses and processing areas, e.g. in the form of rinsing batches, demonstrably documenting the measures.

3 Requirements for Certification Authorities and Auditors

Independence of certification auditors is assured by authorised contracts pursuant to the “Non-GMO” Standard. Authorisation requires compliance with the below requirements. The certification authorities are approved on a contractual basis by the “Non-GMO” Standard owner, i.e. the SKK.

3.1 *Requirements for Certification Authorities*

The certification authority must prove valid accreditation pursuant to ČSN EN ISO/IEC 17065 for product certification (e.g. certification of organic products, organic food and their manufacture) and use duly professionally qualified, verified and competent auditors. Auditor qualification requirements must be documented in the authority´s quality management system manual for the performance of audits according to the “Non-GMO Standard” and in documents on training and education of its auditors. The certification authority must archive all documents and training documents of auditors pursuant to the Standard and submit them to the Standard owner (SKK) authorising the certification authority for the performance of “Non-GMO” Standard certifications.

Every authorised (approved) certification authority can use at least two auditors, meeting the qualification requirements pursuant to chapter 3.2, including both employees and external contractors of the authority free of any conflict of interest. Their activity is within full responsibility of the certification authority.

One auditor cannot audit the same company more than 3 certification periods in a row (3 consecutive years). This period does not include expanding, extraordinary or audits (e.g. changes of locations, etc.) other than periodic annual (recertification) audits of a specific company.

Performance of an audit and certification pursuant to the Standard must be based on the four eyes principle. The auditor is not allowed to make a decision on the certification on the basis of an audit performed by him – the certification authority must use employees to approve the audit report and decision about the certification. Obligations of auditors and reviewers:

- Participation in training according to the “Non-GMO” (implemented by the SKK)
- Participation in training after any Standard amendment according to current requirements

Auditors are trained either by an external qualified trainer or an internal qualified employee of the certification authority.

The results of the certification or other audit must be available within 8 weeks from the completion of the audit; the certification authority must archive them and the related activities in its internal file for every audit performed pursuant to the Standard (periodic audit: current company description including “non-GMO”, checklist, certificate, including certification-relevant enclosures, additional/random audit documentation (checklist including certification-relevant enclosures, certificate).

The certificate is issued on the basis of an audit report with a clear recommendation to issue a certificate, a checklist and annex with complete information about the certified operation. In the case of actions in conflict with this provision, sanctions defined in the contract between the certification authority and the SKK (“Non-GMO” Standard owner) shall apply.

3.2 *Requirements for Auditors*

Every auditor must perform at least 5 complete audits pursuant to the Standard in various agricultural, food or feed manufacturing companies within 2 years), prove attendance at the required training and qualification on the basis of at least one of the following certification systems: ISO 9001, QS, GLOBALG.A.P., GMP+, GTP, IFS, BRC, FSMS, ISCC EU.

The auditor may not audit certified entities for whom he has worked as advisor in the past 2 years.

The auditor must strictly comply with the in-house procedures of the audited company and the certification authority concerning information and data confidentiality.

Justified deviations from the qualification requirements must be approved in writing by the Standard owner (SKK).

The auditor must be continuously educated, at least once every 2 years, or according to current needs. The auditor must be continuously self-educated.

Educational activities may include:

- Training carried out by the owner of the Non-GMO standard - SKK
- Training carried out by a certification authority for its auditors

4 Audits

Audit performance is governed by the company size and production orientation.

Audits are divided into the following categories.

- Certification audit - initial certification of the company according to the "non-GMO" standard
- Recertification audit - audit for renewal of the certificate according to the "non-GMO" standard, performed according to Section 4.6
- Follow-up audit / follow-up visit - if non-compliance is found during a certification or recertification audit. The non-compliance requirements identified during the audit are verified.

Certification, recertification and follow-up audits are always announced prior to the audit, and the certified company is informed of the auditor's visit in advance.

Other types of audits:

- An extraordinary audit may be performed:
    - when a customer files a complaint against the audited organization with the certification authority or the owner of the standard
    - when a breach of the requirements of the "non-GMO" standard by the certified organization is discovered, when this breach is discovered during the audit of another organization in the certification chain
    - when a complaint or suggestion has been submitted to verify the fulfilment of criteria by another recognized certification scheme. This notification is made through the owner of the “non-GMO" standard, which communicates with the certification authority, or directly to the certification authority.

An extraordinary audit may be performed announced or unannounced, depending on the seriousness of the findings that led to the decision to perform the extraordinary audit.

4.1 *Participation of a SKK Representative of the Performing the Integrity Audit*

The person performing the Non-GMO Integrity audit may be present during the audit. This person is included in the audit plan. The person performing the integrity audit must not interfere with the ongoing audit. His task is to supervise and evaluate the auditor's procedure and to evaluate the implementation of the audit and compliance with the requirements of the standard.

The implementation of an integrity audit is further described in Section 1.4.2.

4.2 *Audit Planning*

The auditor shall first become acquainted with the internal control system of the SC, including an audit and classification of risks, or for agricultural farms (animal production) or other agricultural enterprises, while checking:

- Company description and risk classification
- Contract between the certification authority and the customer
- Specification of the scope and period of the audit on the basis of the company’s size, nature of activity and number of locations, and first certification of the “Non-GMO” system
- Audit of the noncertified External service providers (ex. Mobile mixing facilities etc.), which are providing services for the supplier of the NK, regarding results of sampling and testing supplier and applied Corrective Actions to minimize contamination by the supplier.

4.3 *Audit Performance*

The Opening meeting include at least:

- Introduction of the auditor and the involved individuals
- Acquaintance with the planned audit procedure
- Clarification of basic questions concerning the audit process on both sides

Review of documents 1:

- Relevant corporate documents (organisation diagram, quality management system, delivery notes etc.)
- Compliance with Standard requirements (raw material declarations, internal control system, filing, record keeping)

On-Site inspection:

- Manufacturing areas and sites, interviews with employees
- Inspection of compliance with the Standard’s requirements (separate storage and handling, identification of the risks of GM introduction, etc.)
- Sample collection, if planned

Review of documents 2:

- Inspection of quantity flows or other documents and records after the site inspection

Closing meeting:

- Summary of audit findings and clarification of identified nonconformities
- Discussion on remedial measures and their deadlines
- Clarification of the remaining open issues
- Confirmation of the subject and scope of certification (including the number and language variants of the certificate)
- Preparation of audit report (after completion of physical audit)

Activities before, during and after the audit are governed by internal requirements of the certification authority. For completion of the certification (granting or rejection of certificate), a deadline of max. 8 weeks after the completion of the physical audit pursuant to the Non-GMO Standard, including the issue of the certificate, is stipulated (see article 3.1 of the Standard).

4.3.1 Settlement of Nonconformities Found by Audit

If the certification audit finds non-compliance with the applicable legislation and Standard requirements outside the area permitting response and outside Standard requirements making certification impossible, the company is allowed to submit proof of nonconformity settlement checked by the auditor within 40 days from the audit date.

If the audit finds an opportunity for improvement without a significant effect on the fulfilment of Standard requirements, the company must respond before the next audit. In the case of certain types of nonconformities, the auditor may perform a follow-up audit in the area where the nonconformity was found to check implementation of the remedial measures defined by the auditor.

4.4 *Awarding of Certificate*

The certification authority is entitled to perform an additional or random audit. The certificate is issued for the company that has concluded a contract on the performance of a certification audit after successful completion of the audit (including remedy of nonconformities found by the audit).

The audit report including potential discovered nonconformities to which the organisation must respond within the imposed deadline shall be received by the authorised contact person of the audited organisation appointed in the application for certification. The audit report may be forwarded by the authorised contact person to other interested parties, such as suppliers, persons responsible for the operation etc.

The Standard owner shall only accept certificates issued by certification authorities contracted by the Standard owner for the performance of certification pursuant to the Standard.

4.4.1 Specific Situations in the Validity of the Certificate

4.4.1.1 Unfinished Transition Period of Agricultural Holding/Animal Production

In connection with the requirements for compliance with the transition period referred to in Chapter 2.3.2 - Minimum Feeding Time of Livestock, an organization that has not completed the transition period may also be audited. This fact must be recorded by the auditor in the audit documentation, including the date on which the transition period ended.

In this case, the certification authority shall extend the validity of the certificate to the first calendar day after the end of the transition period. This ensures that the business cannot supply the product/food before the transition period is completed. Compliance with the above-mentioned incl. the declaration on the delivery documentation, is verified at the next periodic audit.

4.4.1.2 Serious Nonconformities Identified During the Audit

If non-critical (A) noncompliance’s are identified in the audit, measures must be taken that are approved by the auditor. The certificate is issued after the nonconformity is removed, and in the case of recertification in the original certificate validity. This also applies in the case of a subsequent request for a visit.

Until major non-conformities have been settled (GMO feed or raw material found, complaint, etc.), the food, feed or raw material under “Non-GMO” certification may not be delivered until the non-compliance has been settled.

4.5 *Requirements for Certificates*

A certificate pursuant to the Standard, see Annex 1, shall include the following information:

- Complete name of the certification authority and its logo, where applicable
- The name of the certified company and data about sites in scope of certification (the list must be attached to the certificate as its annex)
- Date of audit and date of certificate validity (certificate expiration date)
- Date of first certification audit
- Number and scope of application of the certificate
- Certified company category: feed production, logistics, agriculture, processing/treatment
- Data on compliance with executive EC legislation in GMO area
- Data on Non-GMO Standard and the number of its version, including Non-GMO mark, where applicable
- Membership number of the certification authority
- Name and signature of authorised representative of the certification authority

- Identification of the certificate holder

Note: The owner of the standard issues a sample certificate (Annex 1), which is available in editable form to the cooperating certification authority.

4.6 *Scope and Validity of Non-GMO Certificate - certification or recertification audits*

The audited organisation applies for the scope of the certificate validity, and the scope is audited in the context of the certification/recertification audit. It may include species or categories of animals, products or services (e.g. “trade in (product group)”, production (e.g. compound feed, etc.). The products appear on the certificate in product groups or with a specification, e.g. for a specific livestock species.

Product groups are identified in the case of food pursuant to Art. 17 of EU Regulation 1169/2011, and agricultural products pursuant to EU Regulation 1308/2013, with reference to the relevant national legislation. If no specific identification is stipulated, common identification can be used, such as meat and meat products, or a non-confusing descriptive identification.

Feed is specified according to feed category and animal species, or the category of animals for which the feed is intended.

Extension of the certification for new product categories must be confirmed by the certification authority with a certificate update. The certification authority may decide on new certification or extension of the existing certification according to the submitted documentation including the extension on the basis of knowledge of the type of operation and its risks, process complexity and nature of the requirement.

The validity period of the certificate is until recertification, which must be implemented at least 4 weeks before the current certificate expires.

Table 1. Recertification audit (renewal of certificate issue) intervals are specified below:

Enterprise category	**Non-GMO certificate validity**	**Additional information**
Food producers	**1 year**	Audit of SC suppliers (farms/animal production) according to the sample see chapter 4.6.1
Agricultural holdings/animal production *(except for participants of superior coordinator)*	**1 year**	
Other establishments: Food/Feed production, trade, processing/treatment, transport, storage	**1 year**	

4.6.1 Audit Intervals Recertification Audits of Supplier Samples - Animal Production in Certification of Superior Coordinator

According to the “Non-GMO” standard, regular annual audits, unannounced audits and recertification audits are carried out. Unannounced audits, recertification audits. The audit interval of producers (suppliers) in the audit of the superior coordinator depends on the risk category.

Risk category	**Frequency of animal production (farm) establishment audits**	**Sample collection in the SCs own establishments or contractually bound suppliers**
0	Every 3 years *(the SC audit is performed annually, and supplier samples are always verified)*	30 % with „Non-GMO“ certification
1	Every 2 years *(the SC audit is performed annually, and supplier samples are always verified)*	50 % with „Non-GMO“

2	Every year *(the SC audit is performed annually, and supplier samples are always verified)*	100 % of suppliers

In the event of a significant breach of the principles of this Standard or unsatisfactory laboratory results, the certification authority may decide to require higher sample collection at the next audit.

When collecting samples of the SCs suppliers, each year audited producers must be excluded from the audit sample in the previous period, taking into account the risk categorization and new suppliers (balanced distribution of audits among involved enterprises).

Audit of Farm External suppliers is carried out regarded sampling and testing results and applied Actions to minimalize contamination by the supplier.

4.6.1.1 Audit of the noncertified external providers (products or services) during an Audit of the sampled SC suppliers

If the farm using **noncertified** External provider (ex. Mobile Mixing and Gridding facilities, warehouses etc.), provider shall take samples for GMO and do testing in accordance of chapter 6.2 and retain tests results. **This noncertified supplier is also a part of the SC audit – chapter 6.2.5.1.**

4.6.1.2 Audit of the noncertified external warehouses or suppliers

If the certified company uses external non-certified warehouses, these warehouses must be subject to an annual audit in the range of 25% of warehouses (minimum 1 warehouse)/ suppliers. – see Chapter 4.6.2

4.6.2 Sampling of the Companies with Multiple Locations or suppliers during certification/recertification audit

In sample collection from multi-site establishments, such as warehouses, samples are collected from individual establishments and verified on site to the following extent:

Risk category	**Audit frequency - central office, warehouses and Processing sites**	**Sample collection from own establishments (sites), uncertified warehouses, logistic sites providing contractual services (e.g. storage, used Ad-hoc Transport companies)**
0	Every year	25% of sites with Non-GMO certification (if 2 establishments are under the same management system, at least 1 establishment is sampled *)
1	Every year	50% of sites with Non-GMO certification (if 3 establishments are under the same management system, at least 2 establishments are sampled *)
2	Every year	100% of sites with Non-GMO certification

* When collecting samples, sites that have not been subject to the last verification must be examined. If an increased risk has been identified in an already audited site, the site must also be included in the sample in the following audit. If the calculation of the % of sampled facilities results in a number with tenths (e.g. 1.1 or 1.6), they shall be rounded up (e.g., 3/50% = 1.5 = sample 2 locations).

In each audit, the headquarters are verified and the system for ensuring the safety of “Non-GMO” products must be checked against the criteria in the following articles of the Standard, depending on the type of operating unit. Additional information is issued to determine the scope of the audit performed.

5 Evaluation of Requirements

5.1 *Plant / Animal Production Area*

The auditor checks and evaluates every requirement of the Standard and compliance with it, with a description of any discovered deviation and explanatory notes for the farmer about corrective measures to be performed.

5.2 *Other Areas*

The auditor checks and evaluates every requirement of the Standard in accordance with international requirements (compatibility with them), see annex 13 and annex 14, as follows:

Rating	Description	Score
A	Complete compliance with the criterion	10 points
B	Minor to medium deviation from the criterion	5 points
C	Non-compliance or major deviation from the criterion	-10 points
N.A.	Irrelevant (must be justified)	-
Risk	Risk of deviation	-15 % of total score
KO	Risk not controlled, legislative requirements not met	Not fulfilled

With the exception of “A” rating, the auditor must explain every rating reduction for the given criterion.

The requirements for Non-GMO certification are met if 75 % or more of the maximum score is achieved and none of the criteria is KO.

The requirements for Non-GMO certification are not met if an above-limit amount of approved GMO content is demonstrably found in the raw materials and products, and if the organization does not ensure the separation of these raw materials from Non-GMO raw materials and products.

If a Non-GMO Standard requirement is not met, the area is classified as KO, which leads to the termination of the certification process and the certificate is not awarded.

The auditor shall mention related audited documents in the comments, including external documentation of the audited organisation meeting the requirements of the Non-GMO Standard, or other certified standards, and provide commentary on his findings.

5.3 *Classification of Findings, Determining and Implementing Remedial Measures*

- In the case of category B rating, reduced classification can be defined according to the type of findings that must be addressed by a certified company until the next audit, when it must be audited.
- Classification of findings in category C is rated by non-compliance with the requirements of the standard, and the enterprise must establish corrective measures to settle the findings, including a deadline for remedy. The method of settlement of non-compliance is approved by the auditor. Depending on the nature of the findings, the certification authority may decide to settle the non-compliance by means of a follow-up audit. After the settlement of these discrepancies, a certificate is issued. If corrective measures are not taken within the agreed deadline and documented by the auditor, the certificate is not issued according to the Standard, or the certification authority may suspend the certificate or withdraw the certificate, of which it must always inform the Owner of the Standard.
- The establishment can demonstrate the removal of type C non-conformities by additional documentation or photo documentation. The audit may be performed by a follow-up audit at the auditor's discretion.

Establishments are placed in the increased risk category in the case of deviations that jeopardize the safety of the Non-GMO production system in the following cases:

Increased risk of deviations from the Standard includes:

- Insufficient self-control system
- Insufficiently implemented sample collection and analysis schedule
- Incomplete traceability system

The listed risk areas are rated as “KO“ – non-fulfillment of requirements, and is specified in the audit forms, see annex 14.

KO rating mean a new certification process.

Some requirements may be assessed as not applicable (N/A) in the establishment. The non-applicability is determined by the auditor and this requirement is assessed as N/A (= not applicable). N/A rating must be justified

in the audit documentation. The KO requirement must not be classified as N/A.

6 Risk Categories, Sample Collection

Risks are categorised on the basis of identification and evaluation of potential sources of GMO introduction in corporate processes. Any use of GMO products within the company (establishment, center) always entails higher risk classification. Agricultural holdings / animal farms, logistics and processing companies are classified by the certification authority in risk categories pursuant to chapters 6.1 - 6.2. Increased risk increases the frequency of inspections and the numbers of samples for analyses taken in the agricultural holdings / animal farms. Every audit re-evaluates the defined criteria for risk categorisation. Evidence of performed risk assessment must be documented and confirmed in the company description.

In the case of plant production, the classification concerns plants cultivation, e.g. grains, oilseeds, vegetables, fruits, seed acquisition and plant seeding, and potential harvest contamination, e.g. pollen spread.

Initial classification in a risk category is carried out by the establishment itself on the basis of its risk analysis of the possible presence of GMOs or the possibility of GMO contamination.

Final risk categorization is performed by the auditor following an on-site audit. The defined risk is always assessed during the audit based on the evaluation of documentation and facts in the operation of the particular establishment and evaluated by the auditor. The risk classification of the establishment must be confirmed by the auditor, or the categorization must be changed - higher or lower, depending on the organization system settings and audit findings.

A company that has applied measures against GMO contamination on the basis of a performed analysis, but subsequent further analysis has identified contamination, is reclassified to a higher risk category.

6.1 *Classification Criteria*

6.1.1 Risk category “0“ – no risk or low risk

- The company uses no GM feed, additives or other raw materials.
- After commencement of Non-GMO feeding, there is no transition to GM feed
- The purchase and supply of high-risk materials and feed in terms of GMO is only from manufacturers of and dealers with feed certified pursuant to the Non-GMO Standard or another system accepted by the Standard owner.
- Agricultural holdings / animal production using stationary or mobile equipment for in-house feed mixing can document that they only process Non-GMO feed and additives, and that the equipment is not used for dual production.
- Single-ingredient feed, compound feed, additives and other raw materials are purchased from manufacturers (stationary or mobile mixing plants) certified according to the “Non-GMO” Standard, or another system recognized by the Standard owner, using only their own transport or external transport certified according to the “Non-GMO” Standard, or any other system recognized by the Standard owner, they apply anti-contamination measures and shall issue a declaration for the individual shipment: Carrier - Annex 21 Carrier's declaration; Mobile mixing of compound feed - Annex 19 - Confirmation of mobile mixing of compound feed (this also applies to provided services, e.g .scrapping, delivery of single-ingredient feed, etc.).

6.1.2 Risk category “1“ – medium risk

- Companies and manufacturing plants with special separation of Non-GMO and GMO products with the application of documented and demonstrable measures against contamination
- Clearly separated transport, storage, handling and trading of Non-GMO and GMO
- The company producing Non-GMO feed uses no GM feed, or the used GM feed/raw materials are well spatially separated and secured and non-confusable
- GM feed and raw materials are not in the same areas of the plant, but the same feed handling and processing equipment is used, and demonstrable measures against contamination are applied

- Producers of compound feed or single-ingredient feed, additives and other raw materials, using their own mobile mixers, worm conveyors, feed carriers and other feed transport and processing equipment for Non-GMO feed and raw materials, who do not hold a “Non-GMO” certificate or other system certificate recognized by the Standard owner, perform documented measures to avoid the risk of contamination (cleaning, rinsing batches, etc.) and submit a statement (Annex 2) on the application of measures against contamination with GMOs, issue confirmation of mobile mixing of compound feed - see Annex 19 of the Standard, and hand over the confirmation according to Annex 21 – Carrier’s declaration.
- Carriers without certification according to the “Non-GMO” Standard that apply anti-contamination measures and submit a declaration (Annex 2) on the application of measures against GMO contamination and issue a certificate for specific deliveries according to Annex 21 - Carrier's declaration (or a declaration of the application of measures against contamination during transport, and a Carrier’s declaration according to GMP + B4).

6.1.3 Risk category “2“ – high risk

- Companies without spatial but with temporal separation of Non-GMO and GM products
- Sample analyses have exceeded the limit values due to neglected measures for prevention of GMO introduction
- The operations use feed or raw materials confusable with GMO ingredients
- Mobile equipment (mobile mixing and shredding trucks (MVKS), feed carriers), feed trucks)processes Non-GMO and GMO feed and raw materials, the company applies measures against contamination (such as rinsing batches, cleaning).
- External mobile feed mixers mixing feed (or performing other services) are not certified pursuant to the Standard and do not submit a confirmation according to Annex 21
- The company performs regular switches between Non-GMO and GM feeding cycles in the same plant area
- The company purchases raw materials from a non-certified producer or supplier without a declaration pursuant to Annex 2.

6.2 *Sample Collection / Audit Intervals*

6.2.1 Sample Collection and Analysis

Companies (feed producers, logistics companies, agriculture / animal production and food processors) certified in the “Non-GMO” system have an obligation to collect samples and analyse them for GMO presence in the internal control system pursuant to the following conditions listed in Article 6.2 and related conditions.

The number of samples / analyses specified below is the compulsory minimum. The analytical results and the remedial measures derived from them are audited. The auditor may to take additional samples in the course of the performed audit at his discretion and analyse them for GMOs; the certified company (audit client) shall be charged for the costs of the analysis.

Every certified company must have its individual sample collection plan, and the frequency of sample collection and GMO analyses is based on the corporate risk classification and product quantity, including records of sample collection dates and analysis results and their documentation, and a sample collection and analysis plan for the following period.

For the first estimate of risk category allocation, the company may use Annexes 5-8, or Annex 10 and 15 for animal production (The Superior Coordinator (SC) suppliers/ farms).

Feed and feed ingredient samples in the area of agriculture / animal production are taken jointly by the supplier and the client, see Annex 3, Sample collection record, or by the superior coordinator from his subordinate producers. The superior coordinator (SC) keeps a sample collection plan for suppliers, keeps records of the performed sample collection, incl. results of performed analyses. In the event of positive results, the SC is responsible for defining measures, verifying the functionality and subsequent sample collection and, if necessary, verifying the functionality by analysis.

Number of samples and tests for GMO for farms under SC is in the table chapter 6.2.5.1, for individual certified

farm is in the table chapter 6.2.5.

Samples are not taken from bagged goods in the categories of logistics and agriculture / animal production in the case of the purchase of mineral compound feed or compound feed purchased from a supplier certified according to the "non-GMO" standard or another recognized standard.

Sample collection and an analysis of the bagged compound feed or supplementary compound feed are carried out:

- **If the supplier mixes the compound feed according to the recipe of the customer (farm) and the supplier is not a certified producer according to this Standard or another recognized standard.**
- **In the certification mode of the superior coordinator, sample collection and analysis is performed by the superior coordinator during the inspection of subordinate suppliers.**

6.2.1.1 Analysis of Raw Materials of Plant Origin, Single-Ingredient or Compound Feed

An audit analysis for the presence of GMOs - screening covering all GMO alternatives to the particular raw material, is recognized. In the case of a positive screening result, quantification of the GMO and the type of modification detected in the sample must be performed by PCR **in laboratory recognised by VLOG** according to the table in Art. 6.2.2 – 6.2.5 depending on the specific type of production and classification in the chain. Depending on the results obtained from the performed screening or quantification, appropriate measures must be applied, see Article 7.1.8.

Principles for analysis of raw materials and feed between audits according to the “Non-GMO” Standard:

- At least one analysis of the supplied high-risk raw material or the highest risk compound feed

One sample and analysis after each switch from dual production to non-GMO production.

Performing analyses for the presence of GMOs is further specified in Annex 18.

List of VLOG accepted laboratories: https://www.ohnegentechnik.org/fuer-prueflabore/liste-der-anerkannten-prueflabore

6.2.1.2 Sample Storage

The last 3 samples from the last 2 months must be stored at a designated place easily accessible by the auditor.

Processors archive reference (final) samples from the last 3 raw material, intermediate product and finished product supplies where GMO analysis makes sense.

The method of sample collection, packaging and size of the reference (final) sample of feed or raw materials for production under the “Non-GMO” regime must comply with the regulations referred to in the note[1]. Stored samples must be clearly identified, secured against unauthorized handling, and stored in suitable premises to preserve their original characteristics. The samples are kept for the period stipulated by the legislation - compound feed for 3 months or for the duration of its shelf life.

6.2.1.3 Sample Size According to EC 691/2013

Sampled lot size	*Minimum amount of subsamples*
Bulk solid feed	
≤ 2.5 tons	7
> 2.5 tons	√ 20x the amount of tons forming the sampled lot, maximum of 40 subsamples
Bulk liquid feed	
≤ 2.5 tons or ≤ 2 500 liters	4
> 2.5 tons or > 2 500 liters	7
Packaged feed - Feed (solid and liquid) can be packed in bags, cans, barrels, etc., which is referred to as packaging in the table.	
1 to 20 packages	1 package

[1] Commission Regulation (EC) No 152/2009 of 27 January 2009 laying down the methods of sampling and laboratory testing for the official control of feed and Commission Regulation (EU) No 691/2013 of 19 July 2013 amending Regulation (EC) No 152/2009 as regards the methods of sampling and analysis - Annex I, shall apply to ensuring homogeneity, correctness, and objectivity of the collection of feed samples.

21 to 150 packages	3 packages
151 to 400 packages	5 packages
> 400 packages	¼ √ of the number of packages forming the sampled lot, maximum of 40 packages
Feed blocks and mineral licks	
At least one block or lick to be sampled per sampled lot containing 25 units	Maximum of four blocks or licks
For blocks or licks weighing more than 1 kg	A subsample is the content of one block or one lick
Bulk feed/fodder	
≤ 5 tons	5
> 5 tons	√5 times the number of tons forming the sampled lot, maximum of 40 subpackages
Subsamples for inspection of components or substances likely to be unevenly present in the feed	
< 80 tons	The number of subsamples, see previous section, must be multiplied by 2.5.
≥ 80 tons	100

REQUIREMENTS FOR COLLECTIVE SAMPLE	
Bulk feed	4 kg
Packaged feed	4 kg
Liquid or semi-liquid feed	4 liters
Bulk feed/fodder	4 kg

Laboratory testing of at least one final sample is required. The quantity in the final sample for laboratory testing must not be less than:

Final samples for GMO testing	**According to Reguation EC 691/2013**	**Recommended sample size**
Solid feed	500 g	1000 g *(1 kg)*
Liquid or semi-liquid feed	500 ml	1000 ml *(1 liter)*

6.2.1.4 Recommended Sample Size for GMO Analysis in an Accredited Laboratory

The following sample size is recommended for GMO analysis of performed in an accredited laboratory::

Bulk feed	***Sample size ****
Barley, sorghum, oats, rice, rye, wheat	0,5 kg
Corn	3 kg
Soya	2 kg
Rapeseed	0,5 kg
TMR (total mix ration) minimal	1 kg

* A representative sample collection procedure is important and critical to the analysis.

6.2.2 Frequency of Single-Ingredient or Compound Feed Sample Collection and their Analysis for Feed Producers or Suppliers (traders, Werhouses)

The risk categorization of a plant producing feed depends on the production method: if the whole plant is working with “Non-GMO” feed, there is a significantly lower risk of GMO introduction than in dual production.

When a mobile device is used to process the customer's raw material, the feed owner customer is responsible for sample collection and analysis – according to 6.2.3.

The collected samples must be recorded and, if necessary, subsequently analysed in accordance with the requirements of the Standard, Article 6.2 and Annex 18.

Every delivered batch of input raw materials for the production of single-ingredient or compound feed must be tested for the presence of GMOs. If a company purchases risk-bearing raw materials certified according to the GMO standard, it is exempted from sampling input raw materials and shall only perform testing to the extent specified below and the related articles of Section 6.2.

The sampling frequency in Article 6.2.2 is the mandatory minimum and may be increased with regard to the risk category.

In the event of a positive result of the analysis for the presence of GMOs, steps in accordance with Article 7.1.8 and related must be followed.

The table below shows the minimum number of raw materials for food or feed samples (single-ingredient and compound feed) certified in the "Non-GMO" system:

Minimum sample collection and analysis of produced / supplied feed or compound feed (Applied for feed production and feed trading with single-ingredient feed and compound feed)			
Products	*Amount of single-ingredient feed / compound feed production*	*Risk category “0” Number of samples and their analyses for GMO presence*	Risk category “1” Number of samples and their analysis for GMO presence
Risk-bearing raw materials (Samples of every delivered batch risk-bearing raw materials Shall be taken, archived and analysed for the presence of GMOs, Result of the test have shall be retain (Test at the screening level by strip test is acceptable (RUR - GMO identification using test strips).	*ALLWAYS – (Every delivered batch)*	*ALLWAYS – (Every delivered batch)*	*ALLWAYS – (Every delivered batch)*
Bulk single-ingredient and compound feed that is „Non-GMO“ certified – not subject to labeling requirement *(no raw materials containing GMOs are processed)*	**< 10.000 t/year**	**1 sample**	**3 samples**
	≥ 10.000 to 50.000 t/year	**2 samples**	**4 samples**
	≥ 50.000 to 100.000 t/year	**4 samples**	**8 samples**
	≥ 100.000 to 200.000 t/year	**6 samples**	**10 samples**
	≥ 200.000 to 300.000 t/year **Every additional 100.000 t = 2 more samples**	**8 samples**	**12 samples**
Bulk single-ingredient and compound feed that is „Non-GMO“ certified in dual production and subject to labeling requirement	**< 2.000 t/year**	**1 sample**	
	> 2.000 to 5.000 t/ year	**2 samples**	
	> 5.000 to 10.000 t/ year	**5 samples**	
	≥ 10.000 to 50.000 t/ year	**10 samples**	
	≥ 50.000 to 100.000 t/ year	**15 samples**	
	≥100.000 to 200.000 t/ year	**20 samples**	
	≥ 200.000 to 300.000 t/ year **Every additional 100.000 t = 5 more samples**	**25 samples**	

6.2.3 Frequency of Sample Collection and Analyses for Mobile Mixers for Mixing Compound Feed

The table below sets out the minimum requirements for sample collection and analysis for the presence of GMOs. The specified range of sample collection takes into account contamination measures that have been applied and are controlled by the mobile mixer operator.

Sample collection is valid for the range after certification according to this Standard. Prior to certification, measures must be set up (rinsing batches, cleaning, etc.) and samples must be collected and analysed for the presence of GMOs to verify that the measures applied are adequate and functional, see Article 7.1.8.

The operator of the mobile mixing equipment shall always provide the customer with a certificate according to Annex 19 (Confirmation of mobile mixing of feed mixtures) to the Standard in accordance with Article 7.1.8.

Minimum sample collection frequency for mobile feed mixers:

Minimum frequency of sample collection and analysis for the presence of GMOs for mobile feed mixers for deliveries according to the “Non-GMO” Standard

(includes the production of compound feed or the preparation of single-ingredient feed (e.g. scrapping), etc.)		
Type of equipment		*Raw materials, single-ingredient and mixed feed certified according to the “Non-GMO” Standard*
1	**Equipment already certified according to the “Non-GMO” Standard** (no raw materials containing GMOs are processed)	**4x a year** incl. analysis for the presence of GMOs
2	**Equipment certified according to “Non-GMO” Standard in dual operation**	**6x a year** incl. analysis for the presence of GMOs
3	**Equipment not certified according to “Non-GMO” Standard**	**8x a year**
4	**Farmer (Farm under SC) used Equipment not certified according to “Non-GMO” Standard**	**8x a year** Or depending on the frequency of use of the equipment per year, at least 1 sample and analysis for the presence of GMOs when using the equipment.

6.2.4 Frequency of Sample Collection and Analyses for Other Establishments

Input raw materials for feed or food production (where technically possible, e.g. raw materials for food production of plant origin) must be tested for the presence of GMOs. If a company purchases risk-bearing raw materials from a supplier certified according to the Non-GMO standard, it is exempted from sampling input raw materials, and testing shall only be performed to the extent specified below.

The samples taken must be recorded and subsequently analysed in accordance with the requirements of the standard and Annex 18.

In the event of a positive result of the analysis for the presence of GMOs, steps in accordance with Article 7.1.8 and related must be followed:

	Logistics	**Trade*** (food), Storage, Animal production** (farms, etc.) which are independently certified*	**Processing****
Risk class	**Raw plant materials, single-ingredient or compound feed**	**Purchased raw plant materials, single-ingredient or compound feed**	**Purchased raw plant materials, single-ingredient or compound feed, raw materials for food production**
0	**2x/year**	**2x/year**	**2x/year**
1	**4x/year**	**6x/year**	**6x/year**
2	**6x/year**	**12x/year**	**12x/year**

* Farmers/animal farms and food processing plants who purchase raw materials, feed and additives only from subject certified according to the “Non-GMO” Standard or another recognized standard and mix this feed in their own stationary or mobile mixers are exempt from sample collection and analysis (does not apply to dual production mixers).

** Samples are not collected if only raw materials for which the presence of GMOs cannot be technically analysed are processed.

*** Traders with single-ingredient or compound feeds carry out sampling and analysis in accordance with Article 6.2.2

6.2.5 Frequency of Sample Collection and their Analysis in Agriculture/Animal Production

Basic sampling and feed analyses with regard to GMO need not be performed if solely mixed or single-ingredient feed from suppliers certified according to the “non-GMO” standard (or another recognized standard) are used for production of Non-GMO food, or if services are provided (e.g. mobile mixers) by suppliers certified according to the “Non-GMO” Standard (or another recognized standard).

If Non-GMO food is produced with use of potential risk-bearing single-ingredient and compound feed by producers certified pursuant to the Standard (or another recognized standard) by agricultural / animal farms, then the farms must request a valid declaration from the supplier.

If a supplier of single-ingredient or compound feed, or services (e.g. mobile mixing of compound feed), **is not certified according to the Standard (or another recognized standard)**, a Supplier Declaration must be provided, see Annex 2, as well as any other documents as specified in the annex to the “Non-GMO " Standard. **Moreover, samples of the risk-bearing raw materials must be taken**, archived and analysed for the presence of GMOs for the specific delivered batch (at least at a screening level - for single-ingredient feed, screening by strip test is acceptable (GMO identification using test strips).

Samples of the actually used raw material by delivered batch analysed by a system member (superior coordinator,

feed producer) holding a certificate pursuant to the Standard can be “included” in the in-house analyses plan as well as in the superior coordinator’s analyses plan (dairy, egg packing plant).

6.2.5.1 Superior coordinator regime

The frequency of feed sample analyses for farmers / animal production included in the superior coordinator’s system (such as dairy farms) is as follows: samples are taken according to the determined classification of the contracted partner (supplier) in a risk category, see certification audit recommendation below. The sampling plan must be established by the SC. **Sample collection and testing for the presence of GMOs is performed annually during the internal audit of the supplier**.

Superior coordinator’s regime (group certification)			
Risk class	**Compound feed**	**Amount of collected samples and performed analyses for GMO presence** (if previous GMO analyses were negative)	**Amount of collected samples and performed analyses for GMO presence** (If previous GMO analyses were positive)
0	**1 x every 3 years**	**1 sample**	**2 samples**
1	**1 x every 2 years**	**1 sample**	**2 samples**
2	**1 x/year**	**1 sample**	**2 samples**

Group certification: For group certification, a sample collection plan is established for individual locations.

The auditor may decide beyond the framework of stipulated sample collection and analysis for GMO presence with regard to the existing risk, beyond the amount listed above, considering:

- Equipment used for milling and mixing
- Inputs of potential risk-bearing feed, see Annex 4, from a non-certified producer
- Regular switches between Non-GMO and GMO feeding within an operation

The costs of the sample collection and analysis shall be charged to the certification client on behalf of the certification authority.

A supplier included in the SC’s regime purchasing raw materials, single-ingredient or compound feed, or other products from a supplier certified according to the Non-GMO standard or another recognized standard, is obliged to check the validity of the supplier's certificate annually. Furthermore, he is obliged to keep a copy of a valid certificate covering all the realized supplies in order to prove the conformity of the delivered product with Non-GMO requirements for the entire period. This fact is verified by the SC during the internal audit of the supplier.

If an supplier of the SC takes single-ingredient or compound feed from a non-certified supplier, this supplier is included the sample of SC audit - see 4.2 and 7.3.4.4 and is a part of sample during certification/recertification audit of SC.

6.2.6 Requirements for Laboratories

Laboratories performing GMO analyses must be accredited for the use of Real-time PCR and other methods. Certified entities can consult the list of laboratories recognised by VLOG Standard - according to Chapter 6.2.1.1.

Evaluation of analysis results must consider standard deviation to take into account the non-homogeneous distribution of GMO in the products (EU Regulation 691/2013) after deduction of extended uncertainty of measurement.

6.2.7 Analyses and Activities for Detecting the Presence of GMOs in a Sample

Requirements for testing (analyses) for the presence of GMOs in a sample are governed by the rules set out in Annex 18 to the Non-GMO standard, incl. notification of suppliers in the event of a positive result of a batch of raw materials, single-ingredient feed or compound feed - Annex 18 – Notifying the supplier of a positive test result for the presence of GMOs in feed and the supplier's statement.

It is also addressed in the form of corrective measures according to Article 7.1.8 - Remedial measures / continuous improvement.

If is a NC supplier moved to a higher risk category, documented measures must be implemented to reduce the occurrence of GMO contamination or eliminate the risk of contamination. Following the adopted measures, verification with a sample and its analysis for the presence of GMOs must be performed.

6.3 *Audit and Certification in Agriculture/Animal Production Category*

The following audit and certification options are established for agricultural holdings:

- Separate certification of agricultural holding / animal production
- Audit and group certification of producers within the **superior coordinator** under the following conditions:
  - Agricultural holdings / animal production are contractually linked to the superior coordinator, which means that the standard (certificate) is not transferable
  - The producers' system of internal control and GMO analyses are used for "Non-GMO" production
  - The superior coordinator launches products according to the "Non-GMO" Standard. If products certified according to the Standard are also launched by an agricultural producer (e.g. direct sales), this is taken into account when calculating the flow of goods in the audit of the superior coordinator
  - If the contracting agricultural producer wishes to sell "Non-GMO" products to another superior coordinator, he must have the consent of his "own" superior coordinator

If the superior coordinator's certification is revoked based on the results of the audits, the placing of products on the market according to the "Non-GMO" Standard is not allowed for the superior coordinator and all contracted enterprises (food suppliers).

6.3.1 Group Certification of Superior Coordinator (SC)

The procedure is in the scheme of Annex 9 to this Standard. Annexes 10 (separation of operations) and 15 there contain a model risk analysis for Non-GMO milk suppliers with welfare control, as well as analysis of production sustainability and safety, see Annex 11.

6.3.2 First Investigation Performed by Superior Coordinator

The superior coordinator will prepare descriptions of contracted plants, cooperating producers and establishments providing treatment, processing, and logistics services. Every contracted entity provides a company description, organisation diagrams, process descriptions etc.

The superior coordinator performs the first investigation in 100 % of the involved entities (food suppliers), i.e. in-house, on-site inspections by trained employees of the SC and the first risk categorisation of its producers pursuant to chapter 6.1. The certification authority approves and checks these in the context of its audit (the first risk categorisation may also be performed by the certification authority itself, and then the SC certification audit does not include audits of producers supplying to the SC).

The sampling scheme performed in the context of the SC audit is shown in the following table in Section 4.6.1 – Audit intervals for agriculture / animal production. The audit sample must exclude producers audited in the previous period, but the risk category and new suppliers must be taken into consideration (balanced audit division among entities).

6.3.3 First Audit and Certification of the SC

The first investigation and in-house inspections performed by the SC are evaluated by the certification authority pursuant to this chapter 4.6.1 and related:

The results of the first investigation and in-house inspections are checked together with audit results based on discovered differences, among other things, and the necessary measures are derived from them. The certification authority may refuse the first investigation results provided by the SC with appropriate justification and insist on 100 % of the first investigation by the certification authority.

The certification authority checks the completeness of the SC's producer descriptions and allocates risk categories to them (including the producer audit interval for the next audit).

New suppliers must be subjected to the first investigation by the SC as soon as possible before their deliveries (including verification by analysis) and audited in the nearest certification audit pursuant to Section 7.2.5 hereof.

7 Non-GMO System Requirements

7.1 *All Categories of the Non-GMO Supplier Chain*

7.1.1 Company Description

The company description must be up-to-date and contain the following company information, see Annexes 5 to 8:

- All raw materials and feed produced, stored, transported and handled by the company
- Recipes and specifications of the manufactured Non-GMO products, including their reprocessing
- List of contracted suppliers and subcontractors, processors etc. involved in Non-GMO production;

The information may be printed or electronic. The current company description, equipment and listed documents are submitted for the audit purposes.

7.1.2 Responsibility Management / Organisation Scheme

The corporate structure, site and organisation scheme are in both written and electronic form, including a description of responsibilities for GMO and substitutability, and a current list of all persons involved in the Non-GMO process (including helpers, apprentices etc.), who must attend training subject to their involvement in the process.

7.1.3 In-House Inspection and Risk Analysis

In-house inspections must consider any separate handling of GM products and Non-GMO products – as with HACCP, a risk analysis must be performed along with preventive and control measures for correctness of identification and use of declaration for identification of Non-GMO feed and raw materials or identification pursuant to the Standard.

In-house inspection/ risk analysis of an establishment must include:

- Record keeping for all raw materials and feed, both Non-GMO and GM
- Handling of these raw materials and feed in storage, processing and transport
- Identification and exclusion of all possibilities of contamination and introduction
- Risk analysis with regard to particular feeds, countries of origin, manufacturing processes and device parameters
- Risk analysis with regard to cleaning procedures, previous vehicles loads etc.

If the certified company uses external non-certified warehouses, these warehouses must be subject to an annual internal audit in the range of 25% of warehouses (minimum 1 warehouse). – see Chapter 4.6.2

For ad-hoc transport, see Article 7.2.10

7.1.4 Sample Collection and Analysis Plan

Suitability of raw materials, measures for Non-GMO goods and finished product separation are documented are evidenced by certification of the "Non-GMO" system, another recognized certificate, the supplier's declaration, or relevant analyses. The company must have an analysis plan pursuant to the requirements of chapter 6.2. (relevant chain link), including the sampling method (type of sample, place of sample collection, name of the person taking the samples, sample size, sample collection frequency, analysis methods. A record can be used to confirm the sample collection, see Annex 3 of the Standard.

7.1.5 Staff Training

All employees involved in Non-GMO operations must be trained according to the Standard and/or internal documentation before commencement of work, and then on an ongoing basis at least once a year. The training sessions must be documented, and the training syllabus must be archived with the attendance sheets containing names of all trainees and trainers, including the date and place of the training session.

7.1.6 Documentation and Archiving

Documents and records must be legible, correct and must exclude possibilities of further manipulation, e.g. in the case of delivery notes, no-health-risk certificates, manufacturing and material flow records (including reworking), training materials and other documents and records for demonstrating compliance with the criteria of the standard. Documents and Records must be archived for at least 3 years from the date of their issue, unless a longer period is required by law.

7.1.7 Traceability

The organization has a traceability system enabling unambiguous identification of all “Non-GMO” products in the enterprise and tracing of products that are no longer in the enterprise, and providing an overview of the quantity and flow of goods. Pursuant to Regulation (EC) No. 178/2002, the following data must be available:

- Information about the supplier and country of origin
- Batch creation, if any (including reworking)
- Information about supply date and the customer to whom the goods were supplied

7.1.8 Incoming Goods Inspection

When goods are accepted by the company, all potential risk-bearing raw materials and feed to be used for Non-GMO production must be inspected for compliance with the requirements, see the current list of potential risk groups in Annex 4.

For risk-bearing raw materials, the company shall provide a supplier confirmation, e.g.:

- Statement of absence of GMOs in the currently supplied batch, see Annex 2, or GMO analysis results for the specific delivery
- Current documented certificate according to the Standard, see Annex 1, or another recognised standard
- Information about Non-GMO nature of the product in the delivery note
- information on the label of the packaged goods supplied (e.g. bags, etc.) - is not subject to the GMO labelling obligation
- Unambiguous contractual agreement on the supply of Non-GMO Products
- Result of an analysis confirming the absence of GMOs in the currently supplied batch
- Another indication on the delivery / consignment note stating that the products are not subject to labelling

All seeds, feed materials, additives, premixtures, complete and supplementary feed, or other additives used, must meet the requirement that the product is not subject to mandatory GMO labelling in accordance with applicable legislation. Information such as “does not contain GMOs”, “is not subject to labelling according to EC 1829/2003 and 1830/2003”, etc., may also be included.

A certified organization purchasing raw materials, single-ingredient or compound feed, or other products from a supplier certified according to the Non-GMO standard or another recognized standard, is obliged to check the validity of the supplier's certificate annually. Furthermore, it is obliged to keep a copy of a valid certificate covering all the realized supplies in order to prove the conformity of the delivered product with Non-GMO requirements for the entire period.

Declarations must be updated annually, as must certificates after their validity changes.

7.1.9 Remedial Measures / Continuous Improvement

The company must document corrective measures adopted with regard to the discovery of internal audits, external audits or complaints and complaint management if a non-compliant condition or product (feed, single-ingredient feed, additive, etc.) is found, and establish appropriate measures in response to the results of the risk analysis and GMO analyses, and continuously reduce/minimize the proportion of accidental contamination with GMOs. The corrective measures adopted must be reviewed by the organization, tested for functionality, and evaluated after a reasonable period of time.

7.1.9.1 Remedial Measures in the Event of a Positive Test for the Presence of GMOs

In the event of a positive test result for the presence of GMOs in a sample (indicative method or PCR method), the supplier or service provider is contacted (Annex 20 - Notifying the supplier of a positive result of a test for the presence of GMOs in feed and the supplier's statement).

The occurrence is documented and remedial measures are adopted against the supplier or service provider according to Article 7.1.8 - Remedial measures / continuous improvement of the Non-GMO Standard. The supplier of the nonconforming product must investigate the cause and determine the appropriate measures, which are verified by a control test.

In the case of a supplier of the Superior Coordinator, the measures must be managed by the SC and concluded in the presence of the SC.

Remedial measures involve confirming the result by performing an analysis for the presence of GMOs - quantification by PCR method.

After the remedial measures have been completed, subsequent deliveries must be verified again by at least an indicative test, and then the measures can be concluded.

For food, Article 7.4.9 of the standard is followed.

7.1.10 Crisis Management

Crisis management includes: potential risk analysis, measures in case of crisis, emergency phone numbers, supplier and customer contact data, internal system for blocking goods subject to complaint proceedings and their unique identification, a system of quick notification of customers of emerged issues, or non-compliance with the Non-GMO principles with an impact on the safety and legality of the Non-GMO product. All certified organizations, with the exception of logistics, must perform product withdrawal testing at least 1x a year – see Annex 12 to the Standard.

7.1.11 In-House Inspection (Internal Audit) System

Companies certified according to the Standard perform annual internal audits of compliance with the Standard requirements. An internal audit must verify the basic requirements of the standard and the specific activities of companies.

Persons performing internal audits must be trained in the requirements of the ISO 19011 and qualified for audit performance pursuant to the feed or food quality standards (e.g. QS, GLOBALG.A.P., IFS, BRC, GMP+, ISCC EU) and the requirements hereof. They must be impartial and may not audit their own work.

7.1.12 Delegation of carriers, external service providers (transport)

If a certified company uses an external carrier for the transport of its own bulk products or for the supply of raw materials, these carriers must carry out activities in accordance with the requirements of Chapter 7.2.10 Transport (Logistics). If it is an uncertified organization, it must provide a declaration of the measures taken against the contamination of the establishments to which it transports the raw materials, ingredients and final feed (in bulk). These measures must be applied and followed. For the declaration, see Annex 21 or another document containing the necessary information.

If an organization uses other external suppliers, e.g. for activities or services directly related to the organization's operations (outsourcing), the organization must be fully certified in accordance with this Standard or another similar standard. It shall submit a valid certificate of compliance. It can also be evidenced by a signed declaration of the external supplier, see Annex 2, with the addition of Annex 21 for carriers.

7.2 *Logistics Category (Storage and Transport)*

Traders only mediating the sale and transport of goods but not handling the goods in any other way must also be certified according to the Non-GMO standard. Organizations providing services such as storage for their customers, e.g. traders, must also be certified according to the Non-GMO standard in order to ensure the quality of raw materials according to the requirements of the Non-GMO standard.

7.2.1 Company Description

The description must be up to date and must include a list of sites, manufacturing lines and external processes, annex No. 7.

7.2.2 In-House Inspections and Risk Analysis

Internal audits must include the areas specified in chapter 7.1.3 hereof and specifications for all final Non- GMO products, negotiated in writing with their contracted partners.

7.2.3 Staff Training

Section 7.1.5 above applies.

7.2.4 Documentation and Archiving

It must include the requirements according to chapter 7.1.6.

7.2.5 Traceability System

The traceability system must include the requirements according to chapter 7.1.7 and manufacture and quantity data.

7.2.6 Sampling and analysis plan, storage of samples

In accordance with the requirements of Article 7.1.8

The company must archive in sealed bags reference (final) samples of loose as well as packed products supplied to customers, at least for the period of the product’s shelf life or 3 months, see Section 6.2.

The results of the analysis carried out after transport of bulk single-species or compound feeding stuffs must be available for transport. The results of the analysis performed by the customer may be used, but it must be clearly identified that this is a specific delivery carried out by the carrier or warehouse keeper.

7.2.7 Separation of Goods Flows / Elimination of Technically Negligible Admixtures

Goods flows must be spatially and temporally separated and clearly identified to avoid confusion.

In the case of temporal separation, minimisation of the risk of GMO introduction must be assured by technological means, and this must be specified in the document describing spatial, temporal and other measures and periodically internally inspected.

7.2.8 Incoming Goods Inspection

Section 7.1.8 above applies.

For transport must be available information from the customer to clearly identify the type of raw material, single-species or compound feed, to being transported. This information is used for in non-GMO transport planning.

7.2.9 Handling of Nonconforming Products

In the case of positive analysis results or identification of products not complying with the Non-GMO requirements, the company must remedy identification defects before the goods are released and eliminate the nonconforming products. In the case of detection of critical amounts of GMO admixtures, remedial measures must be introduced and their effectiveness periodically checked by internal inspections.

7.2.10 Complaint Management and Product Withdrawal

Customer or third-party complaints concerning GMO content that is above the permissible limit must be documented and evaluated and remedial measures must be taken, including responsibility for their implementation. If major deviations from the Non-GMO Standard requirements are found for goods in circulation, product withdrawal must be assured and customers must be notified, or the nonconforming feed must be returned to the producer at his expense.

7.2.11 Declaration in Product Accompanying Documentation

Labels, production documentation, product accompanying documentation, product specification, etc., must correctly specify GMO data according to Regulation (EC) no. 1829/2003 or no. 1830/2003.

A certified feed producer is entitled to mark feed certified according to the Standard with the text “Produced without GMO” or with the “Non-GMO” mark, see Figure 2, Section 1.1. In accompanying documentation of non-certified goods that are not subject to a compulsory declaration obligation pursuant to Regulations (EC) no. 1829/2003 and no. 1830/2003, it is recommended to use the following text: “Suitable for production of

food “Without genetic modification“.

7.2.12 In-House (Internal Audit) System Assurance

The company must perform annual internal audits pursuant to the requirements of the Standard, see chapter 7.1.11.

If the company used non-certified warehouses for storage non-GMO products, the storage has to be annually audited by company internal assessment (internal audit). This supplier is also part of the audit sample – sample is 25% of the storages (minimal one storage) – see chapter 4.6.2.

Logistic (Transport): a part of the internal inspection is the 25% sample of the ad-hoc suppliers (external carriers) for verification the requirements of the standard.

7.2.13 Transport (Logistics) – External Carriers

A certified feed producer and trader may only commission transport of bulk Non-GMO feed with external carriers periodically inspected pursuant to the “Non-GMO” Standard, or certified pursuant to QS or GMP+B4, or other carriers that demonstrably comply with the GMP + B4 regime and submit records of the three previous loads and performed cleaning, and provide a declaration of the application of measured against GMO introduction (1 declaration per delivery is sufficient).

The carrier must also apply appropriate measures in the case of the transport of bagged or otherwise packaged raw materials, feed or components to ensure that there is no introduction and thus contamination of non-GMO operations for which the transport is carried out by the means of the transport vehicle itself. This provision shall not apply to bagged or otherwise packaged feed, raw materials and components.

Transport must be documented, including spatial, temporal and logistics measures, and verified by a self-inspection with the addition of methods for cleaning and cleanliness control of the loading area. The carrier must comply with Articles 7.2.7 and 7.2.8 above.

If the carrier transports bulk raw materials, feed or components and issues a declaration under GMP + B4 - for the three previous loads and cleaning of the loading area, and declares the application of measures against introduction. In the declaration issued for the customer (at unloading), he **must clearly indicate for previous cargo whether any of the previous products transported contained GMOs** (e.g. GM soy meal). **The declaration shown in Annex 21 or a similar document containing the required information may be used. The requirement to provide information on transport also applies to the subcontractor of the carrier for whom the transport order was made** (the carrier hires another external carrier to carry out a specific transport or contract).

7.3 *Agriculture / Animal Production Category*

For the successful certification and delivery of Non-GMO products according to the criteria of this Standard, the requirements of Sections 2.3.2 - Minimum Feeding Time of Livestock, 2.3.3 - Feeding Pursuant to “Without Genetic Modification” Principles, and 2.3.4 – Elimination of Mixing and Confusion.

7.3.1 Company Description

Every establishment must prepare a basic Description of operation - see Annex 5 - food production. It defines the operating conditions for “Non-GMO” feeding, which are the basis for both the internal risk analysis and the external auditor's review.

The audited company submits to the auditor the current description of the organization, equipment and he related documents (documents in paper and electronic form, including records in information systems, are acceptable). Potential substantial changes relevant for risk categorisation must be submitted to the certification authority and the SC.

Points that might lead to GM feed introduction (such as seeds) must be considered, and harmlessness of plant inputs for health and their sustainability must be respected, see annex 11.

If GMO-containing feed is produced, stored, processed or fed along with Non-GMO feed, then the overview must be prepared - a plant sketch (simple scheme with identification of operating sections and warehouses). The guide in such implementation is e.g. Annex 10, with clearly shown animal species, separation of breeds and stables, feed storage places, equipment for feed production and handling.

7.3.2 Responsibility Management / Organisational Chart

Structure of the company, workplace and organizational chart (both in written and electronic form). The chart must include a clearly defined description of responsibilities for the "Non-GMO" area, substitutability and an up-to-date overview of all persons involved in the "Non-GMO" process (including e.g. purchasing, warehousing, etc., as well as all staff and auxiliary staff, apprentices, etc.). All these positions involved in activities must receive training according to their level of involvement - see Annex 15.

7.3.3 Ordering Feed

Feed orders must be in writing to prevent confusion in compliance with the requirements for Non-GMO food production. A framework supply contract clearly defining the requirements for the supply of “Non-GMO” feed, raw materials and feed supplements, including the provision of transport respecting “Non-GMO” supplies, is also acceptable.

Accompanying **documentation of the feed producer must be identified** in compliance with Regulation (EC) no. 1829/2003 or no. 1830/2003". If a GMO declaration is included in the document, this feed, raw material or component for its production must not be used to feed animals certified pursuant to this Standard.

Suitability for use in non-GMO operation may be declared on the product sheet, label or a separate declaration that the “Feed is suitable for the production of food labelled Non-GMO”, or a declaration under this standard with a “Non-GMO” label. In the case of a permanent supplier, this can be replaced by a declaration of compliance with the parameters "Non-GMO" for several deliveries, see Annex 2, but the duration of the validity of the declaration must always be stated. For certified products under this Standard, information is provided on the product documentation in accordance with applicable legislation, and a copy of a valid certificate pursuant to the "Non-GMO" Standard is submitted (one copy of the certificate for the validity period available in the organization is sufficient). Declarations must be updated annually, as must certificates after their validity changes.

7.3.4 Internal Audit System

7.3.4.1 Survey of Animal Headcount and Compliance with Minimum Feeding Period

All animal species and categories for food production and their feeding in compliance with the “Non-GMO” Standard or GMO feeding must be recorded. In the case of purchased animals, the company must comply with and document the minimum feeding periods (see Section 2.5.2), or verify compliance with the minimum period of Non-GMO feeding by the previous owner evidenced e.g. by the previous owner´s confirmation, etc., when purchasing animals.

Minimum feeding time for purchased animals are referred in Article 2.5.2.1 Minimum Feeding Time for Purchased animals.

7.3.4.2 Feed Rations

The company must keep separate ration records for each animal species and category. This also applies to individual species/categories of animals in various stages of their life when different rations are used. Feed components must be accurately identified according to valid legislation. The feed rations must be clearly specified, e.g. “extracted rapeseed meal”, not only “rapeseed”. Feed rations may also contain individual amounts of a specific raw ingredient in the compound feed – recipe, which also fulfil the requirement of Section 7.3.4.3.

7.3.4.3 Feed Lists

The company must keep up-to-date lists of all used feed, their origin and propose for use (animal species/category) for the purpose of inspection of documentation of every supply of Non-GMO feed or seed.

The current list of feed shall also include in-house produced feeds and purchased seeds and plants. The list must be amended with new feed, and old consumed feed must be removed. The list must include dates of first purchase and consumption.

Another alternative is a list of feed as a chronological set of invoices and delivery notes.

7.3.4.4 External Service Providers

External service providers, such as providers of mobile mixers, carriers and machinery providers, may cause GMO

introduction if their equipment is used for processing of GMO and Non-GMO feed, or to transport GMO and non-GMO raw materials. This also applies to the use of oils and other liquid components not containing GMO, the method and sequence of rinsing.

The company may only use carriers pursuant to Section 7.2.10 for external transport of feed, or carriers who are demonstrably compliant with GMP + B4 and submit a record of the three previous loads and cleaning of the loading area, and who provide a declaration of the application of measures to prevent introduction (1 declaration is sufficient for a set of deliveries with clear identification of the specific deliveries for which the declaration is valid). This provision shall not apply to the transport of bagged feed, raw materials and components.

If external mobile mixers are used (for feed mixing, scrapping, etc.), the mobile mixer operator must submit a confirmation to the customer according to Annex 19, and each party shall have one counterpart of the confirmation.

If external carriers ordered directly by the plant (not the supplier of raw materials or feed) are used, the provisions of Article 7.2.10 (3) concerning information about the three previous loads and cleaning of the loading area shall apply, with a submitted declaration. The declaration shown in Annex 21 or a similar document containing the required information may be used.

If uncertified suppliers are used, e.g. mobile compound feed mixers, these suppliers must submit a declaration on the application of anti-contamination measures, see Annex 2.

In the case of mobile compound feed mixers, they must submit confirmation, see Annex 19 - Confirmation of Mobile Compound Feed Mixing, which will be filled out directly by the customer..

These suppliers must be included in the sampling plan, see Article 7.1.4. If a positive result of the analysis for the presence of GMOs is found, documented measures must be taken and the result must be verified by a control analysis. This also applies to suppliers under the NK, if non-certified suppliers of mobile compound feed mixing services are used, a sample must be taken and analysed in accordance with Chapter 6.2.3 - point 3.

If the control analysis reveals the occurrence of GMO contamination of the supplied single-ingredient, compound feed or supplementary feed, measures must be taken in accordance with Article 7.3.13.

In the case of repeated discovery of the presence of GMOs (exceeding the limit of 0.9% per component) despite the implementation of anti-contamination measures, this supplier is subject to an audit by a certification authority, which is performed as part of the audit of the certified entity. The application of anti-contamination measures is verified.

7.3.5 Staff Training

Section 7.1.5 above applies.

7.3.6 Documentation and Archiving

Delivery notes, invoices for operating materials (e.g. seeds), accompanying documentation to feed, orders, declarations, etc. must be archived for at least 3 years from the date of their issue, unless a longer period is required by law.

7.3.7 Sample Collection Plan and Analyses

The requirements are only binding for agricultural holdings/animal production not included in the superior coordinator’s certification scheme: the company must compile its analysis plan on the basis of the risk analysis pursuant to chapter 6.2, whereas sample collection and analysis for the presence of GMOs must be carried out annually.

7.3.8 Traceability System

It is necessary to clearly identify all products in a “Non-GMO” business at any time without delay, and to trace products that are not in the business within 1 working day and obtain an overview of the quantity and flow of goods. Pursuant to Regulation (EC) no. 178/2002, the following data must be available:

- Origin information (country, supplier)
- Batch formation, if any (including reworking)
- Information on the date of delivery and the customers to whom the goods were delivered

7.3.9 Incoming Goods Inspection

Upon acceptance of bulk goods (raw materials, components, feed), all potential risk-bearing raw materials and feed must be checked for compliance with Non-GMO requirements, and evidence must be available in the relevant feed, seed and component documents and in accompanying documentation, see the current list of potential risk-bearing raw materials, Annex 4.

In the case of in-house production of raw materials of plant origin (plant production), documents from the supplied seed must be available - seed supplier's declaration, product sheets, etc.

The feed supplier (manufacturer) may issue a “Non-GMO” declaration:

The seller declares that the goods he delivers to the buyer pursuant to this agreement are not subject to any labelling within the meaning of Regulation (EC) no. 1830/2003 and Regulation (EC) no. 1829/2003 of the European Parliament and of the Council.

The seller undertakes to allow the buyer and the inspection, certification or other administrative authority to inspect this property of the goods under the conditions of Commission Regulation (EC) no. 152/2009 concerning determining sampling methods and laboratory testing for official feed control.

Labelling of these goods by the manufacturer shall be indicated in accordance with Regulation (EC) no. 1830/2003 of the European Parliament and of the Council.

To ensure traceability, completeness of data in the feed delivery notes must be checked and the delivery notes must be filed in chronological order (e.g. in the operating log, etc.). Mobile equipment operators must confirm compliance with the applicable requirements and document rinsing batches. In the case of raw materials and feed with certification according to the “Non-GMO” Standard or another recognised standard, the obligation of sample collection and analysis pursuant to chapter 6.2. does not apply.

If raw materials, single-ingredient or compound feed, or other Non-GMO products are purchased from a certified supplier, the organization is obliged to annually check the validity of each supplier's certificate. Furthermore, it is obliged to keep a copy of a valid certificate covering all realized deliveries in order to prove the conformity of the delivered product with Non-GMO requirements for the entire period. This fact is verified by the SC during the internal audit of the supplier. Declarations must also be updated annually.

7.3.9.1 Packaged raw materials, components and mixtures

GMO feed subject to labelling under Regulation (EC) no. 1829/2003 of the European Parliament and of the Council on genetically modified food and feed, and Regulation (EC) no. 1830/2003 of the European Parliament and of the Council of 22 September 2003 on traceability and labelling of genetically modified organisms and the traceability of food and feed produced from genetically modified organisms, must bear this fact on the label.

7.3.10 Goods Flow Separation /Elimination of Mixing Risk

Feeds unsuitable for Non-GMO food production may not get into the raw material or feed flow for the production of Non-GMO food, i.e. the respective goods flows must be spatially and temporally separated, and all products must be clearly identified.

Concurrent is only possible with spatial separation and technological minimisation of GM material introduction, i.e. the following must be observed:

- Vehicles must be demonstrably dry cleaned after the transport of loose GM feed.
- Measures pursuant to chapter 2.5.1.2 must be performed and documented in the context of every regular switch between Non-GMO and GM feeding within a single operation unit, according to chapter 2.5.3/2.5.4.

The technological steps must be documented by the company in writing with specification of the spatial, temporal and other measures. Their effectiveness must be periodically checked by internal inspections, and the results of tests for GMO presence must be taken into account.

7.3.11 Outgoing Goods Inspection

All responsible employees most know the GMO status of feed and the status of the animals from food intake via animal production to animal product supply. They must assure that only products in full compliance with Non-GMO requirements leave the company and that the minimum feeding periods after animal purchase or feed

switch are observed.

In the case of suppliers whose animal products are produced by a system with possible transitions from Non-GMO to GMO production (e.g. egg production with repeatedly beginning feeding periods), correct identification of each supply must be included in the accompanying documentation pursuant to Regulation (EC) no. 1830/2003.

7.3.12 Non-Conforming Product Handling

In the case of positive analysis results or identification of products not complying with “Non-GMO” requirements, the enterprise must remove labelling defects and eliminate non-compliant products before releasing the goods; if excess levels of GMO additives are detected, documented remedial measures and their regular verification through an internal audit must be carried out - see chapter 7.2.7.

7.3.13 Corrective actions

The company continuously reduces the proportion of accidental GMO contamination through appropriate actions to eliminate GMO contamination to a minimum. The taken actions must be inspected, their functionality must be verified, and they must be evaluated after a reasonable period of time, which also applies to corrective actions arising from audits and positive results of analyses performed for the presence of GMOs - see Chapter 7. 1. 9.

If an agricultural holding finds positive GMO analysis results for single-ingredient feed and mixtures that have been delivered to the enterprise, it shall inform the supplier thereof in order to prevent the transfer of GMOs. Consequently, corrective actions must be implemented and documented to prevent a repeat of nonconforming supply, see Annex 20 (Notification of the supplier of a positive result of the test for the presence of GMO in the feed and the supplier's statement).

The implementation and effectiveness of corrective actions shall be monitored and verified in an appropriate time period.

7.3.14 Complaint Management and Product Withdrawal

Identical with chapter 7.1.9 – agricultural holdings/animal farms included in the superior coordinator’s certification scheme must inform the SC, including discussion about appropriate remedial actions. The SC cooperates with his supplier in monitoring and removing detected nonconformities.

7.3.15 Crisis Management

Crisis management includes: analysis of potential risk, crisis measures, emergency numbers, contact details of suppliers and customers, an internal system for blocking non-conforming goods with complaints against them and their clear identification, a system of quick notification of customers of a specific problem, or non-compliance with “Non-GMO” principles affecting the safety and legality of “Non-GMO” products - see chapter 7.1.10.

The requirements do not apply to agricultural holdings / animal farms not included in the superior coordinator’s certificate schemes.

7.3.16 In-House Inspection (Internal Audit)

The company must perform annual internal audits to verify compliance with the requirements of the Standard - see chapter 7.1.11.

Internal auditors must be trained according to this Non-GMO Standard, their training must be documented, and their audit must be impartial – they must not audit their own work.

7.3.17 Requirements for Animals Transport / Animals Trading

If animal trade/transport is carried out by the company (farm), the following specific requirements must be met in addition to the general requirements set out above.

7.3.17.1 Incoming Inspection of Animals

When animals are received, it must be ensured that all animals meet the following requirements:

- The delivery notes of each delivery must indicate that they are Non-GMO animals. This information must be provided on the delivery notes / transport documents for each individual animal and / or group of animals.

- For each delivery, the inclusion in group certification (written verification by the certification authority of the group organization) for the area of applicability of the animal species / category must be verified in a risk-oriented manner.
- For each delivery, it must be verified whether the animal is Non-GMO, and a risk assessment must be carried out with regard to Non-GMO.

7.3.17.2 Risk Management

The company transporting the animals must take into account the following areas, together with the requirements set out in Section 7.1.3:

- Separation of animals that are transported from Non-GMO farming and GMO farming
- Where possible, take into account the risks of handling Non-GMO feed and feed that is subject to GMO labelling in accordance with applicable legislation
- Other specific requirements, as necessary

For the production of food or food ingredients of animal origin labelled according to the Non-GMO standard, only feed that is not subject to mandatory labelling according to valid legislation may be used for animal feed.

7.3.17.3 Separation of Goods Flows / Prevention of Mixing and Confusion

When loading and handling animals, the organization must address possible risks to ensure the requirements of the Non-GMO standard. The requirements must be properly documented and evidenced for each operation. Documentation and provision of adequate spatial, temporal, logistical or other measures and their effectiveness in the process of the company's own control (internal audit) must be reviewed.

Requirements for the transport of animals in Non-GMO certification

Animals from a farm certified in the Non-GMO regime (also applies to the SC’s regime) must be transported individually and / or separately from animals that do not come from a Non-GMO farm. Only the following exceptions are allowed:

- Animals / animal categories must be clearly identified (e.g. ear tags in bovine animals with a unique identification number for each animal):
    - o When accepting animals, their identification must be checked. Only correctly identified animals can be accepted.
- Animals with farm identification (e.g. ear tags for pigs indicating the farm number):
    - If animals are transported from a farm that is demonstrably only Non-GMO, the operational identification of the animals serves as sufficient verification of the application of their department.

If animals are accepted from a Non-GMO-certified farm, or a farm certified by another recognized standard, as well as animals f rom a GMO farm, they must be separated into different groups during transport. The separation must be verifiable.

The separation must be documented in the transport documents.

Employees handing over or taking over animals at the place of unloading must check that they are clearly identified.

The company must prepare the documentation and carry out an evaluation, see Annex 16 - Animal Trade / Transport.

7.4 *Requirements for Processing / Treatment Category*

7.4.1 Company Description

The company description (Annex No. 08) pursuant to Section 7.1.1 must be up-to-date and must include:

- An organizational chart with specification of all competences
- An overview of all Non-GMO ingredients and components including reworking, recipe and recipe change approvals by the authorized person.

7.4.2 In-House Inspection and Risk Analysis

Pursuant to chapter 7.1.3; in the case of suppliers of aromas, enzymes, microorganism cultures, additives, technical excipients and other food ingredients, a certificate in the sense of compliance with the Standard regulations, or a Supplier declaration on the absence of GMOs, see Annex 2, are required.

7.4.3 Sample Collection and Analysis Plan

The company must compile an analysis plan pursuant to the performed risk analysis, including the requirements of chapter 6.2.1 and a sampling procedure description (sample type, sample collection place, name of the person taking the sample, sample size, sample collection frequency and analytical method). Sample collection and analysis for the presence of GMOs must be carried out annually.

Use of GM feeds is not generally demonstrable in animal products (milk, meat and eggs).

Food processing plants working with raw materials of animal origin must check reliable separation of Non-GMO and GM products and assure the required Non-GMO declarations and certificates from the food ingredient suppliers.

In the case of group certification, the superior coordinator must include sample collection and analysis plans in its in-house control system and assure their implementation, see chapter 6.2.1 and related, for contracted agricultural companies / animal farms.

If an agricultural / animal farm only feeds its animals with Non-GMO compound feed or no-risk single-ingredient feed, it need not collect samples and analyse its feed with for GMO presence. However, if potential risk-bearing (single-ingredient) feed from suppliers without Non-GMO certification are used, sample collection and analysis for GMO presence must be assured in these companies by their SC.

7.4.4 Staff Training

Section 7.1.5 above applies.

7.4.5 Documentation and Archiving

Governed by chapter 7.1.6.

7.4.6 Traceability System

Must include the requirements specified in chapter 7.1.7 and the following information:

- Information about origin, including documentation for Non-GMO identification
- Information about raw materials, additives and excipients used and their origin (including reworking)

7.4.7 Incoming Goods Inspection

Incoming inspections are governed by chapter 7.1.8. Each supply must be provided by its supplier´s confirmation that it meets requirements for use of food/food components of animal origin, certified pursuant to the Standard or another recognised equivalent standard. For components of origins other than animal, proof may be provided in the form of:

- A documented general confirmation of the delivered goods to be issued by the supplier annually
- A note in the delivery note and an unambiguous formulation in the contract

The documents must confirm that the used ingredients, additives and excipients are not GMO, are not made of GMOs, do not consist of GMOs and are not made with the help of GMOs. The documents may be submitted by filling out the form included in Annex 2, or in a similar document including at least the required minimum information.

If manufacturer certificates are available for aromas, enzymes, microorganisms cultures, additives or excipients that are valid for a longer period, the company must check their validity at least once a year, including a check for potential changes of product specifications.

In the case of suppliers whose goods are produced by a system with possible transitions from Non-GMO to GMO production (e.g. egg production with repeatedly beginning feeding periods), correct identification of each supply must be included in the accompanying documentation.

7.4.8 Goods Flow Separation /Elimination of Risk of Mixing Together

Identical to Section 7.3.10.

7.4.9 Outgoing Goods Inspection

The company must check correct identification in the specifications, manufacturing and accompanying documentation, labels etc. pursuant to Regulation (EC) no. 1830/2003. The company may use the text “without genetic modification” or the “Non-GMO” mark according to the Non-GMO declaration in advertisement and marketing materials with reference to Article 7 (Use of Non-Misleading Information) of Regulation (EU) no. 1169/2011 on the provision of food information to consumers.

7.4.10 Remedial Measures / Continuous Improvement

Single-ingredient and compound feed are governed by Section 7.1.9.

In the case of food of plant origin with a positive result of the analysis, or identification of products that do not comply with Non-GMO requirements, these products must not be supplied under Non-GMO certification. Before releasing the goods, the company must eliminate labelling defects and exclude non-conforming products, if the content of GMO admixtures is found in excess of the limit, and implement documented corrective actions against the recurrence of contamination. The action must be verified and subsequently checked during an internal inspection (internal audit)- see Section 7.2.7.

This does not apply to food products in which it is not technically possible to detect the presence of GMOs in a food or its ingredient.

7.4.11 Complaint Management and Product Withdrawal

Customer or third-party complaints concerning GMO content that is above the permissible limit must be documented and evaluated and remedial measures must be taken, including responsibility for their implementation. If major deviations from the Non-GMO Standard requirements are found for goods in circulation, product withdrawal must be assured and customers must be notified, or the nonconforming feed must be returned to the producer at his expense.

7.4.12 Crisis management

Identical to Section 7.1.10.

7.4.13 In-House (Internal Audit) System Assurance

The company must perform annual internal audits pursuant to the requirements of the Standard, see chapter 7.1.11.

7.5 *Specific Requirements for Mobile Mixing Equipment*

7.5.1 General

Mobile feed mixers must meet the requirements for compound feed manufacturers - see chapter 7.1 and related. The following sections define the specific requirements for mobile mixers and the provision of other services for customers (e.g. scrapping).

7.5.2 Documentation for the Operation of Mobile Mixing Equipment

The mobile mixer operator must have the following documentation be available for each mobile mixer:

- Equipment documentation
- Operating rules of the facility defining the method of disposal of compound feed residues after production (can be a separate document)
- Sanitation rules or another similar document defining sanitation and maintenance of equipment
- Machine operation log or another appropriate record showing that the equipment has been cleaned
- Decontamination rules, also including the implementation of measures in the dual production of compound feed and measures applied against contamination by the processed GMO product

- Documentation proving the production sequence of compound feed (production plan, route plan, etc.), proving the production sequence of compound feed and the application of a rinsing batch, according to internally established measures
- A report must be issued for the compound feed produced, providing information on the compound feed and the ingredients; this also concerns feed where one or more of the ingredients have been supplied by the operator of the mobile compound feed production facility.
- Documentation and delivery documentation must be prepared to allow traceability from the customer to the supplier and, in the case of ingredients/components supplied, it must also be prepared for these components (see chapter 7.1.7).
- Confirmation of the performed mixing is handed over to the customer according to Annex 19 of the “Non-GMO” Standard (the confirmation may be part of the company's normal documentation, but it must contain all the required information).

7.5.3 Frequency of sampling and analysis, sample collection

The frequency of sample collection and analysis for the presence of GMOs by operators of mobile mixers for the production of compound feed (single-ingredient and mixed feed) is set out in Article 6.2.3. Requirements for GMOs analysis of collected samples are set in Article 6.2.1.

Sample collection must be carried out in the presence of the customer and must always be approved with the customer, and it must be carried out according to established criteria. A sample collection report (Annex 3 - Sample collection record) must be drawn up for each sample collection. The samples must be taken in the quantity specified in Article 6.2.1.3 – 6.2.1.4 and stored according to the requirements of the standard of Article 6.2.1.2, unless a longer period is specified.

7.5.4 Feed transport or trade

If the company transports, handles, stores and trades raw materials, components or other additives, including trading the final feed, which is subject to certification under another article of this Standard, the requirements of this Standard must be fulfilled - Article 7.1 and related, according to the activity performed.

7.5.5 Specification of corrective measures

If the Non-GMO certified equipment is found to be positive for the presence of GMOs in compound feed or single-ingredient feed, the operator of the mobile mixer shall be informed of this fact immediately in writing, see Annex 20.

The operator must conduct a cause analysis and implement documented corrective actions to eliminate the causes, Article 7.1.9.1. The actions must be subjected to functional testing by sample collection and analysis for the presence of GMOs.

The functionality of the specified actions must be checked by the operator at least once a year. The result must be documented and is part of the record of the company's internal inspection/internal audit.

8 Rules for Imports from the EU and Third Countries

If goods that are to have the “Non-GMO” mark or text are imported from the EU, the importer must know and follow changes in the legislative requirements of these countries and compare them to this Standard. If products identified pursuant to another certification standard as products “Without genetic modification” are imported, the importer must study the standard according to the requirements of Section 2.3. Third-party suppliers must provide confirmation pursuant to Annex 2, or the Non-GMO product certification and GMO analysis for the respective batch.

9 List of Annexes to Non-GMO Standard

Annex 1	Non-GMO certificate, template (Czech, English, German and Slovak version)
Annex 2	Supplier declaration

Annex 3	Sample collection record
Annex 4	High-risk feed and ingredients
Annex 5	Description of operation – production of Non-GMO food - Agriculture – Dairy production
Annex 6	Description of operation – production of Non-GMO food – Feed production / trade
Annex 7	Description of operation – production of Non-GMO food - Logistics
Annex 8	Description of operation – production of Non-GMO food – Processing / modification
Annex 9	System of group certification of superior coordinator
Annex 10	Table of superior coordinator’s process, e.g. in the production of Non-GMO milk
Annex 11	Internal audit of primary producer of agricultural commodities (GMP+, GTP, ISCC, Non-GMO)
Annex 12	Withdrawal of Non-GMO products, template
Annex 13	Activities in Non-GMO area in links of the food chain
Annex 14	Inspection form for certification categories A1 - trade/feed trade, A2 - agriculture /animal products, A3 - logistics (transport, storage), A4 - processing / modification
Annex 15	Risk analysis of individual suppliers of Non-GMO milk, audit questionnaire, template
Annex 16	Animal Trading / Transport
Annex 17	Registration form for Non-GMO certification, template
Annex 18	GMO testing and analysis for raw materials/feed
Annex 19	Confirmation of mobile mixing of compound feed
Annex 20	Notification of the supplier of a positive result of the test for the presence of GMOs in the feed and supplier’s statement
Annex 21	Carrier declaration, template

10 Related Documents

- ČSN EN ISO/IEC 17065 Compliance assessment – requirements for authorities certifying products, processes and services
- ISO/TS 34700:2016 –Animal welfare management – General requirements and guidance for organizations in the food supply chain)
- EUROPEAN COMMISSION: State of play in the EU on GM-free food labelling schemes and assessment of the need for possible harmonization, Final report, str. 37
- Czech Government Regulation 189/2018 Coll., government regulation on sustainability criteria for biofuels and reducing greenhouse gas emissions from fuels
- VLOG Standard "Ohne Gentechnik" – List of VLOG-recognized laboratories (in the version): https://www.ohnegentechnik.org/fuer-prueflabore/liste-der-anerkannten-prueflabore