

# Questions and answers document for EFISC-GTP companies

Be aware that this document aims at helping you to grasp the main differences between the old and the new versions of the codes. It cannot replace careful reading of the new EFISC-GTP code 4.0 itself.

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## 1. Introduction

This document contains some of the questions (and related answers) that were asked during some training events organized by EFISC-GTP Aisbl. Participants in the EFISC-GTP scheme are always invited to ask questions regarding the interpretation of documents such as the Certification Standard, certification rules and industry documents. Companies can send questions to the following email: [info@fisc-gtp.eu](mailto:info@fisc-gtp.eu). This document will be updated periodically.

## 2. Questions and answers section

### Q&A on handling of non-certified feed/food and non-feed/food ingredients in collection, trade, storage and transport (negative labelling)

#### Q&A:

**Q:** *Positive labelling is a new requirement for EFISC-GTP certified companies, but can EFISC- GTP companies use in parallel negative labelling?*

**A:** *Besides positive labelling ('EFISC-GTP Certified feed or food'), an EFISC GTP certified company is allowed to use negative labelling ('This feed/ food ingredient is not covered under the EFISC-GTP certification) for commercial reasons.*

**Q:** *Can an EFISC-GTP operator resell feed meal as non-certified material?*

**A:** *An EFISC-GTP operator (scope F), can resell non certified feed meal following the indications provided at page 32 of the code (paragraph 4.3.9). Negative labelling rules apply.*

### Q&A on multi-site certification

#### Q&A section

**Q:** *In case of a multisite certification, can a rented site be certified together with other sites?*

**A:** *Yes. The following 2 conditions must be met:*

- *There is a legal or contractual link with the central office of the operator and the rented site must be subject to a common Feed/Food Safety Management System*
- *In the rented site, operations related to the scope of the operator must be carried out.*

## Q&A on crisis management

### Q&A:

**Q: In case of salmonella contamination of feed, it may happen that a re-analysed product is negative (at the first test it was positive). In this situation, is it necessary to inform EFISC-GTP according to the incident notification procedure?**

*A: In case of salmonella contamination, there is usually a suspicious level (PCR analysis) and a confirmation level (ISO). In accordance with what is indicated in the decision tree on page 11 of the Incident notification procedure, EFISC-GTP should be informed in case of confirmation (EFISC-GTP operators can also inform EFISC-GTP in case of suspicion). Anyway, in case of suspicion, as indicated in the decision tree, clients that have eventually received the suspected product, must be informed.*

**Q: In case of salmonella contamination in France with a non-critical serotype, should EFISC-GTP be informed?**

*A: In case of salmonella contamination with a serotype not considered critical in France, in agreement with the footnote 2 at page 11 of the [Incident notification procedure](#), “in case the first seller has the information that final destination will be another country, the first seller should inform his buyer in case of any Salmonella suspicion” and it is the duty of the exporting company to comply with the local legislation (country of destination). This is due to the fact that legislation and obligations resulting from salmonella contamination (for feed) may change among European countries. So, a non-critical serotype in one country may be critical in some other country. The company that manufactures or sells the suspect feed product must assess the specific legislation of the recipient country (as well as that of the place of production). In case of suspicion, he must inform the end customer/s. In case of confirmation, he must also inform EFISC-GTP (see previous point).*

**Q: Are there any innovative treatments on the feed (final product) in order to eliminate possible salmonella contamination?**

*A: There are treatments based on the use of radiation, although there are several restrictions in EU countries. It is however advisable to carry out a good control on the production process in order to avoid the development of this bacterium. In this sense, it is advisable to follow the instructions provided in this document: [salmonella checklist](#).*

## Q&A on application of the gatekeeping rules

### Q&A:

#### **Q: In the case of a trader who operates mainly in the food sector, how do the gatekeeping rules apply**

*A: Page 25 of the code states, “incoming materials including processing aids, premixtures and additives, will be handled in agreement with the following control programmes: entry check product or gatekeeper procedure”. The last one is applied in case the supplier is not certificated against one of the schemes indicated in the annex 3 of the Code (page 65). In agreement with the footnote at page 25, “with the exception of direct farmers supply and unprocessed raw material (like oilseeds and grains) which do not required to be certified when are subject to further industrial processing (except compound feed) as they will be covered by the plant entry check program. So, no gate-keeper procedure required”, raw materials (to be used to produce feed or food) are excluded from the application of the gatekeeping rules. In case of feed, the gatekeeping rules are described in the “Gatekeeping rules for feed and specific requirements for by-products from the Oil & Fat Industry”.*

*In case of food, the indications provided at page 27 (Table 2: Guidance minimum monitoring gatekeeper) apply. Please note that, in this case, referring to the analyzes indicated in table 2 on page 28, the operator can **adjust and define** the hazards and monitoring frequency based on his documented risk assessment: in other words, the operator can perform, where appropriate, more or less analysis. In case of processing aids, premixtures and additives, in case they are produced by an operator not certified against a scheme indicated in the annex 3, hazards and monitoring frequency should be based on his documented risk assessment*

#### **Q: If a company buys oilseeds, it must apply the rules of the gatekeeping for feed?**

*A: Gatekeeping for feed materials “Gatekeeping rules for feed and specific requirements for by-products from the Oil & Fat Industry” apply to feed and not to a material that is not classified as such (feed). When is a material considered feed? Below some examples:*

- *Unprocessed oilseeds for further processing are not yet a feed*
- *Unprocessed oilseeds used as feed directly without further processing is feed (example soybeans)*
- *Grains/pulses for further processing in the food industry are not a feed*
- *Grains/oilseeds and pulses directly purchased from farmers are not a feed: this depends to what is indicated in the selling contract*
- *Grains and peas can also be food/raw material and therefore be out of the scope of the gatekeeper. It always depends on the usage.*

*Following some examples of gatekeeping operation:*

*a. An EFISC-GTP trader purchasing rapeseeds from a non-certified source to be sold to another trader, is not requested to apply gatekeeping rules because rapeseeds are not used as a feed (rapeseeds need to be processed to become feed).*

*b. An EFISC-GTP trader purchasing soybean feed (if the destination of the oilseed is direct feeding) from another trader, is requested to apply gatekeeping rules in case the seller is not certified.*

*c. An EFISC-GTP collectors purchasing directly seeds from farmers: according to the footnote at page 25 of the EFISC-GTP Code, “with the exception of direct farmers supply and unprocessed raw material (like oilseeds and grains) which do not require to be certified when are subject to further industrial processing (except compound feed) as they will be covered by the plant entry check program”, gatekeeping rules should not be applied*

d. EFISC-GTP industries (example Fediol or Starch Europe ones) purchasing raw material (example maize or soybeans or rapeseeds). In this case the footnote at page 25 of the code applies: “ with the exception of direct farmers supply and unprocessed raw material (like oilseeds and grains) which do not required to be certified when are subject to further industrial processing (except compound feed) as they will be covered by the plant entry check program. So, no gate-keeper procedure required”. Industries are requested to apply an entry-check program according to the paragraph 4.3.1.3 of the Code.

**Q: Regarding gatekeeping (for feed) operations carried out by operators, what information must be communicated by the operators themselves to EFISC-GTP?**

A: EFISC-GTP does not ask its operators to communicate all individual gatekeeping operations. Companies must communicate this information to their certification bodies as indicated in paragraph 5 of the “Gatekeeping rules for feed and specific requirements for by-products from the Oil & Fat Industry”. What EFISC-GTP requires its operators is to make a single annual communication by October of each year, using the specific excel file provided, in order to give general and cumulative information on all gatekeeping operations carried out during the year. The instructions are described in the same paragraph 5.

## Q&A on transports

### Q&A:

**Q: In some countries there is a limited availability of certified transporters. What can be done in these cases?**

A: Follow the instructions provided in paragraph "4.3.11.4 Transport by road - letter c" of the code