



EFISC.GTP

Gatekeeping rules for feed and specific requirements for by-products from the Oil & Fat Industry

This document contains the following chapters:

- **Common gatekeeper requirements for unprocessed and processed feed material**
- **Common gatekeeper requirements for palm (Kernel) oil (crude, refined and/or fractionated) for feed**
- **Common gatekeeper requirements for former foodstuff**
- **Specific requirements for by-products from the Oil & Fat Industry**

Changes indicated in grey

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Version	Title	Publication date	Final implementation date
1.0 of 15.03.2019	Specific requirements for by-products from the Oil & Fat Industry	30 July 2019	1 December 2019
1.0 of 15.03.2019	Common gatekeeper for palm (Kernel) oil (crude, refined and/or fractionated)	30 July 2019	1 December 2019
1.0 of 15.03.2019	Common gatekeeper requirements for unprocessed feed products	30 July 2019	¹
1.0 of 28.06.2019	Common gatekeeper requirements for former foodstuff	30 July 2019	1 December 2019
1.0 of	Common gatekeeper	July 2020	1 January 2021 ²

¹For contracts signed before the publication day of this protocol (30 July 2019), monitoring and frequency rules indicated in this protocol (for unprocessed feed material) will apply as of 1 December 2019 and limitations due to the country of origin indicated in this protocol (for unprocessed feed material) will apply as of 30 June 2020. For contracts that will be signed after the publication day of this protocol (30 July 2019), all rules indicated in this protocol (for unprocessed feed material) apply.

15.06.2020	requirements for processed feed products		
1.0 of 21.04.2021	Definition of the paragraph 4 and 5.	2021	May 2021

1.0 Introduction

This gatekeeping protocol describes the rules that have to be applied, by EFISC-GTP certified companies, when they purchase feed material not covered under the scope of either an EFISC-GTP certification or another accepted feed safety certification. Certification of the whole supply chain is the main goal as to improve the quality and safety of feed products, starting at the processor of the raw material. In incidental cases, the supply chain is not certified, or just partly certified. For these cases, the gatekeeping requirements apply. The above-mentioned principle, using gatekeeping, if no certification is in place, should be applied for this protocol and by all involved producers and traders.

2.0 Common gatekeeper requirements for unprocessed, processed feed material and palm (Kernel) oil (crude, refined and/or fractionated)

This protocol is meant to bring via a gatekeeping system unprocessed, processed feed and palm (Kernel) oil (crude, refined and/or fractionated) into the certified supply chain (EFISC-GTP scheme or a recognized scheme (see annex 3 of the [EFISC-GTP Code 4.0](#)).

² For new contracts signed as of 1 January 2021

	Unprocessed feed products	Processed feed products	Crude, refined and/or fractionated palm(kernel) oil ³
Product groups	Unprocessed grains, oilseed and pulses	Processed feed materials ⁴	Processed feed products from vegetable origin
Origin⁵	<p>Gatekeeping allowed for non-certified origin (products from trader or collector, whereas direct farm supply is excluded), from all countries with the exception of: Netherlands, Belgium, Luxembourg, Germany, France, UK, Denmark, Austria, Ireland, Greece and Canada</p> <p>For unprocessed feed product, origin is the country where the seller (of the non-certified products) is localized. If a certified company sells FOB to a certified company, then the FOB buyer can apply the gatekeeper.</p>	<p>Gatekeeping allowed for non-certified origin, from all countries with the exception of Germany, Netherlands, Belgium, Luxembourg, United Kingdom, Austria, Pakistan (Molasses), Malaysia (Palm kernel expellers) and Indonesia (Palm kernel expellers)</p> <p>For processed feed product, origin is the country where the feed material was processed and if there is a trader in between, this one shall be located outside the countries indicated in the table unless the processed feed material is sold on FOB conditions.</p>	All countries outside EU
Applied by	Certified companies against: GTP Code Version 1.3 A or EFISC-GTP Code 4.0 (scope G and F)	Certified companies against: GTP Code Version 1.3 A or EFISC-GTP Code 4.0 (scope G and F)	Companies that buy above mentioned products based on FOSFA contracts 53, 54, 80 or 81.

³as defined in the EU Feed Catalogue (Reg 68/2013, n. 2.20.1)

⁴A processed feed material is any type of feed where its natural state has been altered: the physical, chemical or nutritional composition of the product has been changed. Examples of activities that result in a processed feed material are crushing/pressing, pelleting, extrusion, expansion, extraction, toasting, grinding and acidification.

⁵ The selection of countries will be annually updated with the other recognized schemes

Time frame of application	No time limitation for application of the gatekeeping	No time limitation for application of the gatekeeping	No time limitation for application of the gatekeeper
Sampling	GAFTA, FOSFA or others by the sector recognized sampling rules. Requirements for sample taker see paragraph 2.2.	Batch by batch	Batch by batch. For frequency of testing, see the table at the paragraph 2.3. Sampling in accordance with EN-ISO method 5555 (Animal and vegetable fats and oils - Sampling) by a FOSFA Member Superintendent.
Monitoring frequency⁶	<ul style="list-style-type: none"> - Batch by batch according to the table provided in paragraph 2.3-a - Possible derogation: according to the indications provided in the paragraph 2.3.a 	<ul style="list-style-type: none"> - Batch by batch (according to the table provided in paragraph 2.3-b) - Possible derogation: according to the indications provided in the paragraph 2.3.b 	Batch by batch. The samples will in any event be analyzed for the parameters which are summarized in paragraph 2.3-c. If the hazard analysis shows that a higher testing frequency is necessary or that other parameters deserve attention then these should be tested, too.
Requirements for the application of the gatekeeper	<p>For the certified gatekeeping company:</p> <p>HACCP principles apply for the evaluation of:</p> <ul style="list-style-type: none"> - feed material - the supplier and - the supply chain <p>as laid down in:</p> <ul style="list-style-type: none"> - <i>GTP code version 1.3 A</i> <p style="text-align: center;">or</p> <ul style="list-style-type: none"> - <i>EFISC-GTP Code 4.0 (scope G and F)</i> 	<p>For the certified gatekeeping company:</p> <p>HACCP principles apply for the evaluation of:</p> <ul style="list-style-type: none"> - feed material - the supplier and - the supply chain <p>as laid down in:</p> <ul style="list-style-type: none"> - <i>GTP code version 1.3 A</i> <p style="text-align: center;">or</p> <p>EFISC-GTP Code 4.0 (scope G and F)</p>	<p>Application of HACCP principles to evaluate</p> <ul style="list-style-type: none"> - The feed material - The supplier - The flow through the supply chain <p>as laid down in:</p> <ul style="list-style-type: none"> - <i>GTP Code version 1.3A - April 2014</i> <p>OR</p> <ul style="list-style-type: none"> - <i>EFISC-GTP Code 4.0</i> <p>OR</p> <ul style="list-style-type: none"> - <i>EFISC Code 3.1</i> <p>The company risk assessment has to be based on own info including the Industry risk assessment.</p>

⁶ Definition of a batch see Paragraph 2.1 (EFISC-GTP code 4.0)

<p>Notification</p>	<p><u>Notification to the CB</u>, that the company uses gatekeeping. Following information must be available during the audit:</p> <ul style="list-style-type: none"> - Name of the supplier - Raw material definition - Analysis results - Information on the process (process flow, HACCP and others): if available - Information on the supply chain (transport, storage and other) - Relevant information necessary for a risk assessment (see also EFISC-GTP code 4.0) <p>Note: (parts) of the above listed information might not always be available (e.g. details of the process). In the framework of application of HACCP-principles and risk assessment, this lack of information can finally result in defining more control measures and monitoring.</p>	<p><u>Notification to the CB</u>, that the company uses gatekeeping. Following information must be available during the audit:</p> <ul style="list-style-type: none"> • type of the raw materials, production methods, process flow and environment from which the feed is derived, to be able to complete the risk assessment for each feed. • name and address of the supplier (producer/trader) • purchased feed material • results of risk & lab analysis <p>Note: (parts) of the above listed information might not always be available (e.g. details of the production process). In the framework of application of HACCP-principles and risk assessment, this lack of information can finally result in defining more control measures and monitoring.</p>	<p><u>Notification to the CB</u>, that the company uses gatekeeping. The gatekeeper must register per palm oil mill location:</p> <ul style="list-style-type: none"> - The name, address, etc. (if available) - The processes carried out (if available) - The oil products produced <p>Further, from every batch received must be registered</p> <ul style="list-style-type: none"> - The volume - The sea vessel - FFA at port of loading - FFA at port of arrival (if available) <p>Records and documentation related to the application of this protocol must be documented.</p> <p>The documentation of the details mentioned above must be available for the auditor.</p> <p>Note: (parts) of the above listed information might not always be available (e.g. details of the production process). In the framework of application of HACCP-principles and risk assessment, this lack of information can finally result in defining more control measures and monitoring.</p>
<p>Supplier evaluation</p>			<p>Applies to FOSFA contracts nos. 53, 54, 80 or 81, which are based on application of the manual “FOSFA qualifications and procedures for vessels engaged in the carriage of oils and fats in bulk for edible and oleo chemical use”.</p>

			Palm oil must enter in EU in conformity to FOSFA contracts suitable for food production in EU refineries.
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2.1 Sampling frequency

Definition of a batch as indicated in the paragraph 2.6.1 of the EFISC-GTP code 4.0.

In case of trucks: each truck should be sampled and analysis should be done per 20th sample.

Sampling should be preferable done at loading or discharge.

2.2 Requirements for sample taker

Independent superintendent organisation accredited according to ISO 17020 or ISO 9001 (only in combination with a GAFTA approval). For road transport own sampling can take place.

2.3 Requirements for monitoring

a. For **unprocessed feed material**, the final samples must be analysed on the following parameters:

- Pesticide residues (relevant pesticides must be covered)
- Heavy metals (Arsenic, Lead, Mercury and Cadmium)
- Dioxins (sum) and dioxin-like PCBs and non-dioxin like PCBs (see possible derogations)
- PAH's (see possible derogations)
- Mycotoxins:
 - DON: at least applicable to all cereals
 - ZEA: at least applicable to all cereals and soy beans
 - OTA: at least applicable to all cereals
 - Aflatoxin B1: at least applicable to maize
 - Ergot: only on wheat, rye and triticale
- HCN (hydrocyanic acid): linseed

Possible derogations:

- Sum of dioxins and dioxin-like PCBs: in case of a **written statement** that natural gas is applied or indirect drying is applied the 100% monitoring can be reduced
- Non-dioxin like PCB and PAH's: in case of a **written statement** that natural gas is applied or indirect drying is applied the 100% monitoring can be reduced.

b. For **processed feed material**, the final samples must be analysed according to the following monitoring plan:

1. A – Cereal grains and (by-)products
Excluded: unprocessed grains, oilseeds and legumes (see Gate-Keeper-Protocol: unprocessed grains, oilseeds and legumes), Examples: 1.1.2 Barley, puffed, 1.1.4 Barley flakes, 1.2.5 Maize cobs, 1.4.3 Oat flakes, 1.4.5 Oat bran, 1.4.6 Oat hulls, 1.6.1 Broken rice, 1.7.4 Rye bran, 1.11.7 Wheat bran...
2. B – (by-)products from maize starch prod
Examples: 1.2.3 Maize middlings, 1.2.10 Maize germs, 1.2.4 Maize bran, 13.3.1 Starch (maize) 13.3.2 Starch pre-gelatinised (maize), 1.2.8 Maize gluten, 1.2.9 Maize gluten feed, 1.2.15 Maize steep liquor, 4.1.6 Isomaltulose molasses, 13.2.2 Dextrose, 13.2.5 Glucose Molasses...
3. C – (by-)products from wheat starch production
Examples: 1.11.15 Wheat protein, 1.11.11 Wheat germ, 13.3.1 Starch (wheat) 13.3.2 Starch pre-gelatinised (wheat) 1.11.16 Wheat gluten feed, 1.11.19 Liquid wheat starch, 1.11.20 Wheat starch containing protein...

4. D – (by-)products from potato starch production

Examples: 13.3.1 Starch (potato), 13.3.2 Starch pre-gelatinised (potato), 4.8.10 Potato protein, 4.8.14 Potato juice, concentrated, 4.8.8 Potato pulp, 4.8.2 Potato peelings, steamed, 4.8.15 Potato granules

5. E – (by-)products of oil seeds, oil fruits, oil supplying plants

Excluded: unprocessed grains, oilseeds and legumes (see Gate-Keeper-Protocol: unprocessed grains, oilseeds and legumes),

Examples: 2.8.3 Linseed meal, 2.13.2 Pumpkin and squash seed, expeller, 2.14.2 Rape seed, expeller, 2.14.3 Rape seed meal, 2.14.6 Rape seed expeller feed, 2.18.2 Soya (bean) expeller, 2.18.3 Soya (bean) meal, 2.18.4 Soya (bean) meal, dehulled, 2.18.5 Soya (bean) hulls, 2.19.2 Sunflower seed expeller...

6. F – (by)products from sugar production

Examples: 4.1.1 Sugar beet, 4.1.2 Sugar beet tops and tails, 4.1.3 (Beet) sugar, [sucrose], 4.1.4 (Sugar) beet molasses, 4.1.5 (Sugar) beet molasses, partially desugared, 4.1.7 Wet (sugar) beet pulp, 4.1.8 Pressed (sugar) beet pulp, 4.1.10 Dried (sugar) beet pulp, 4.1.11 Dried (sugar) beet pulp, molassed, 4.1.13 (Sugar) beet pieces, boiled, 12.2.1 Vinasses [condensed molasses soluble], 7.6.1 Sugar (cane) molasses...

7. G – (by)products from beer production

Examples: 1.12.12 Brewers'grains, 12.1.5 Yeasts [brewers'yeast], 12.1.12 Yeasts products, 1.12.14 Mash filter grains, 13.1.15 Feed beer, 1.12.7 Moist distillers' grains...

8. H – (by)products from malting

Examples: 1.1.19 Malt rootlets, 1.1.18 Malt...

9. I – Brewers'grains

Examples: 1.12.8 Concentrated distillers solubles, 1.12.9 Distillers'grains and solubles...

10. L – Glycerine as (by)product from seed oil production

Examples: 13.8.1 Glycerine, crude (plant origin), 13.8.2 Glycerine (plant origin)...

11. M – legumes, their products and by-products

Excluded: unprocessed grains, oilseeds and legumes (see Gate-Keeper-Protocol: unprocessed grains, oilseeds and legumes)

Examples: 3.7.2 Horse bean flakes, 3.8.2 Lentil hulls, 3.1.1 Beans, toasted, 3.6.1 Guar meal...

12. N – Dried grass meal

Examples: 6.4.1 Clover meal, 6.10.5 Luzerne meal, 6.5.1 Forage meal, [grass meal] [Green meal]...

13. O – (by)products from fruit processing

Examples: 5.22.2 Fruit pulp, 05.22.3 Fruit pulp (dried), 5.4.2 Apple pulp, pressed, 05.04.03 Apple molasses, 5.13.1 Citrus pulp, 5.13.2 Citrus pulp (dried),...

14. P – Feed fats and oils

Examples: 2.20.1 Vegetable oil and fat, 9.2.1 Animal fat, 2.21.1 Crude lecithins...

	A	B	C	D	E	F	G	H	I	L	M	N	O	P
Pesticide residues	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Aflatoxine B1	X ^b	X ^b			X				X ^b				X ⁱ	
DON	X	X	X					X	X					
ZEA	X	X	X		X	X		X	X					
Fumonisin es	X ^b	X ^b							X ^b					
OTA	X	X	X					X	X					
T2/HT2	X ^a													
Heavy metals 4 (As,Cd,Pb, Hg)	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Heavy metals 5 (As,Cd,Pb, Hg + F)														
Dioxins and DL PCB's	X	X	X	X	X	X	X ^d	X	X	X	X ^d	X	X	X
Non-dioxin-like PCB's	X	X	X	X	X	X	X ^d	X	X	X	X ^d	X	X	X
Polycyclic aromatic hydrocarbons (PAH4)				X ^d		X ^d				X	X ^d	X	X	X ^j
Salmonella	X	X	X	X ^f	X	X	X	X	X		X	X		
Hydrocyanic acid					X ^c								X ⁱ	
Antibiotic a							X ^g							
Nickel														X ^k
Methanol										X				
Insoluble impurities														X ^m
Clostridium				X ^e										

^a only for oat and oat products; b. only for maize and maize products; c. for linseed; d. if dried; e. if delivered directly to farmer; f. for protein products; g. for yeast if production process is unknown; i. for almonds and apricots; j. vegetable oil only; k. only for solid fats; m. only for animal fat if no proof of non-ruminant origin.

A **derogation on sampling (batch by batch) and testing (previous table) conditions** is only possible if all following conditions are met:

- A derogation can only be possible in case of a **fully segregated supply chain** from the non-certified producer to the Gatekeeper. All links in the chain needs to be known.
- A **clear proof** that the non-certified supplier (one step back) is going to be certified against the GTP standard (or EFISC-GTP for scope G and F) or equivalent, within 18 months is available. If after the 18 months the non-certified supplier is not certified, the batch by batch monitoring must be applied
- An **adapted sampling and testing plan** have to be motivated based on HACCP evaluation
- **Derogation is only possible after approval of the certification body** (a notification to EFISC-GTP shall be sent).
- The verification on compliance is carried out by the certification Body as part of the certification of the gatekeeper

c. For crude, refined and/or fractionated palm or palm kernel oil, the following table applies:

Substance	Hydrocarbons		
Rejection limit	25 mg/kg (ppm) total hydrocarbon compounds (C10-C24) calculated as diesel oil	or	400 mg/kg (ppm) total hydrocarbons (C10-C40)
Analysis method	GC-MS		GC-FID
Testing frequency	Each batch		Each batch
Substance	Pesticides residues		
Rejection limit	Maximum residue limits for pesticides as laid down in Regulation (EC) No. 396/2005 and Directive 2002/32/EC		
Testing frequency	Once in 6 months, various origins		

Substance	Dioxin and dioxin like PCB's
Rejection limit	Maximum residue limits as laid down in Reg. (EG) No. 574/2011
Testing frequency	Once in 3 months, various origins
Substance	Heavy metals
Rejection limit	For Lead, Cadmium, Arsenic and Mercury, maximum residue limits as laid down in Reg. (EG) No. 574/2011
Testing frequency	On the basis of a hazard analysis but at least once per year
Substance	Free Fatty Acids (FFA)

Acceptance limit	When FOB in port of loading max 7 % When CIF in port of arrival max 10%
Testing frequency	Each batch

3.0 Common gatekeeper requirements for former foodstuff

This protocol is meant to bring via a gatekeeping system former foodstuffs for use in feed, into the company certified against the EFISC-GTP scheme.

	Description
Product groups	<ul style="list-style-type: none"> • Former foodstuff (intended for use as feed)⁷ <p>Excluded from the scope</p> <ul style="list-style-type: none"> • By-products originating from the food industry (e.g. beet pulp, brewers' grain, etc) and manufactured for animal feed • Raw material for foodstuff • Feed additives • Prohibited products
Origin	Any origin
Applied by⁸	<p>Certified companies against:</p> <ul style="list-style-type: none"> - EFISC Code 3.1(or EFISC-GTP Code 4.0 for scope D) - GTP Code Version 1.3A⁹(orEFISC-GTP Code 4.0 for scope F and G) <p>that <u>purchase former foodstuff (intended for use as feed) directly from a non-EFISC (or GTP or EFISC-GTP or equivalent) certified food company (supplier).</u></p> <p>The operator purchasing former foodstuff that is not yet suitable as feed material must process the product into a feed material first. A validated treatment or cleaning must be performed to remove physical contaminants (e.g. glass, plastic, metal) before the former foodstuffs can become intended for feed. The treatment or cleaning must be in accordance with the EFISC-GTP requirements.</p> <p>The food company (supplier):</p> <ul style="list-style-type: none"> - has a written HACCP plan including the hazard analysis related to the former foodstuff - is certified for a production scope in order to process the former foodstuff in order to be used as feed.
Time frame of application	No time limitation for application of the gatekeeper
Sampling	Sampling as laid down in the EFISC-GTP standard, paragraph 4.4.3.
Monitoring	Monitoring as laid down in the EFISC-GTP standard, paragraph 4.4.3.

⁷ See paragraph 3.1 for definitions.

⁸This protocol is not applicable when the former foodstuff demonstrably originates from an EFISC-GTP company (or equivalent) already participating in the feed safety assurance scheme: this company must bring the production of the former foodstuff under the scope of his feed safety certificate in case he wants to sell the former foodstuff to other feed companies.

⁹Resell of former foodstuff that has to receive a validated treatment or cleaning to remove physical contaminants (e.g. glass, plastic, metal) before becoming suitable for feed is possible only if the former foodstuff is accompanied with a **Feed Safety Data Sheet**(see the definition in the paragraph 3.4) and all the necessary information in accordance with the requirements as laid down in Annex VIII of Regulation (EC) No. 767/2009.

frequency	
Requirements for the application of the gatekeeper	<p>The EFISC-GTP company carries out a risk assessment per former foodstuff, as laid down in the paragraph 6 of the EFISC-GTP core (4.0).</p> <p>The risk assessment must consider all operations and activities, from the original production of the former foodstuff up to delivery to the participant purchasing the former foodstuff, and must result in addressing and controlling all hazards related to the former foodstuffs.</p> <p>The EFISC-GTP company, in cooperation with the supplier (food company) must fill out a Feed Safety Data Sheet (see the definition in the paragraph 3.1) or an equivalent document (containing at least the information indicated in the definition).</p>
Notification	Notification to the CB, that the company uses gatekeeping.
Supplier evaluation	<p>Each year, the gatekeeper (operator) performs an audit at the food company. When food company is certified for BRC including Module 9, 1 audit/2 year is sufficient.</p> <p>The gatekeeper (operator) performs in any case an audit prior to any initial delivery of former foodstuffs and in case of significant changes in the product and/or production process. In case the operator does not have qualified auditor (see paragraph 3.2), may delegate the conduction of it to a qualified one.</p>

3.1 Definitions

	Description
Foodstuff (intended for use as feed)	Finished food products, which were manufactured for human consumption in full compliance with relevant national legislation and labelled as foodstuff by the food company, but which are no longer intended for human consumption due to practical, logistical or commercial reasons and do not present any health risks when used as feed.
Former foodstuff (intended for use as feed)	Finished and semi-finished foodstuff and food ingredients, which were manufactured for human consumption, but not labelled as foodstuff by the food company and no longer intended for human consumption due to problems of manufacturing or packaging defects or other defects and do not present any health risks when used as feed.
Semi-finished foodstuff	A raw material which has already been processed, but requires further processing into a finished product.
Feed Safety Data Sheet	<p>A Feed Safety Data Sheet is a document that gives a description and specification of the former foodstuffs intended to be used as feed. It includes:</p> <ul style="list-style-type: none"> - Contact details of the purchasing and supplying company - Identification of the product and production process, including information from the HACCP analysis, used ingredients, indication of

	<p>chemical composition, relevant product standards, instruction about storage and transport, storage life, labelling, monitoring, indicative analysis, etc.)</p> <ul style="list-style-type: none"> - a statement that the former foodstuff was produced under a HACCP-system (this may be a self-declaration from the food company but preferably accompanied by independent evidence, like a certificate) - statement about the reason for placing the former foodstuff on the feed market.
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3.2 Qualifications of the supplier auditor

Supplier¹⁰ auditor must be qualified according to the follow requirements:

- Education/training: relevant agricultural or foodstuffs education/training. Training for internal auditor or another, equivalent, auditor training with respect to methods and techniques aimed at the assessment of feed safety management systems.
- Knowledge: according to the paragraph 3.1.3.1 of EFISC-GTP Rules of Certification: letter g and h.
- Work experience: minimum 1 year working experience of in the feed / food sector in a relevant position (for example quality assurance or purchase of former foodstuffs).
- Independence/impartiality: the supplier auditor must have an independent position in relation to the supplier and to commercial activities of the feed company. This should be reflected in the job description of the supplier auditor and the organization chart of the company. The supplier auditor conforms to the strict implementation of the gatekeeper protocol.

4.0 Extra audit time for gatekeeping activity

During audit, EFISC-GTP certification bodies are requested to increase the audit time of 0.25 hours (as a minimum) per gatekeeping file (IA, surveillance and recertification audit).

The minimum number of files to be reviewed per 3 years can be calculated as square root of the total number of files (N) per 3 years rounded up to the next integer (Example: if N = 50, the minimum number of files to be controlled per 3 years is 8). If N > 100 (per 3 years), the minimum number of files to be controlled per 3 years is 10.

Certification bodies are requested to report in their audit reports gatekeeping information in tabular way (limited to the files selected) according to the following scheme:

Supplier	Product	Feed category (unprocessed, processed...)	Origin (Country)	Amount (tons)	Starting date or period

¹⁰ The operator who wishes to conduct a supplier audit but does not have qualified supplier auditors, may delegate the conduction of these audits.

5.0 Communication of gatekeeping information to EFISC-GTP certification Bodies and to EFISC-GTP

EFISC-GTP certified companies are requested to:

- notify the certification body about the application of the gatekeeping rules (see paragraph 2)
- notify to EFISC-GTP the eventual application of derogation for the purchasing of processed material (see paragraph 2.3 b)

Certification bodies are requested to set the rules of notifications of application of gatekeeping rules by the certified companies to the certification bodies themselves.

EFISC-GTP certificated companies are requested to communicate annually the following information to EFISC-GTP:

- amount (expressed in Tons) of feed material purchased via gatekeeping
- origin of the material
- period during which the companies applied for gatekeeping

Companies are requested to send annually to EFISC-GTP this information filling the enclosed template (**annex 1**) and sending it to: info@efisc-gtp.eu or fulvio.pernice@efisc-gtp.eu. Annex 1 shall be sent by companies certified against the GTP Code 1.3 or against the EFISC-GTP Code 4.0 (for the scope G and F) that purchase feed material via gatekeeping not later than October of each year. Companies will be provided with the instruction at the beginning of each year.

6.0 Specific requirements for by-products from the Oil & Fat Industry

6.1 Introduction

By-products from the Oils and Fats industry are often used in feed. Basic principle is that these by-products need to come out of a closed certified chain. This means:

For an EFISC-GTP producer

A producer (**certified against the EFISC 3.1 Code or EFISC-GTP Code 4.0, scope D**) of by-products from the oil milling / crushing and refinery (see annex 1 of this document) needs to assure the feed safety in compliance with the EFISC-GTP standard, and be certified as such. In addition, this certified producer should specifically demonstrate compliance with the relevant additional requirements, which are laid down in the paragraph 4.2. Specific sourcing requirements have been laid down for a soapstock splitter.

For an EFISC-GTP trader

A trader/importer (**certified against the GTP Code version 1.3A or EFISC-GTP Code 4.0 for scope G and F**) of these products must - within the framework of this EFISC-GTP protocol - purchase from the above mentioned producers. This trader must also, demonstrate compliance with the relevant additional requirements, which are laid down in the paragraph 4.2.

6.2 Requirements

6.2.1 Requirements for oil and fat by-products

Topic	Requirement/condition	Explanation/guidance
Scope & application		
What feed products are we talking about?	<p>Any product derived directly or indirectly from crude or recovered oils and fats by oleochemical or biodiesel processing or distillation, chemical or physical refining, other than:</p> <ul style="list-style-type: none"> - refined oils, - products derived from refined oils - feed additives; <p>to be used in feed As per Annex I of this document (source: Regulation (EU) 2015/1905)</p>	<p><u>These conditions apply to:</u></p> <ul style="list-style-type: none"> - By-products of vegetable oils/fats - Products from the oleochemical industry, which are laid down in Regulation (EU) No 68/2013 (the Catalogue of feed materials) <p><u>These conditions do not apply to:</u></p> <ul style="list-style-type: none"> - Crude oil (examples: crude degummed oil, crude palm oil etc.) - By- products of fats/oils from animal origin - Products mentioned in the so-called Feed Register <p>In Annex 1 examples of products are listed which are in of the scope of this appendix.</p> <p>For an overview of processes of refining of oils, downstream processing of oils and biodiesel production process please refer to the EFISC-GTP sector document on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining.</p>
From which origin?	Any origin, except when produced by an EU based and registered food company	If the producer is based in the EU and registered as an EU food operator and the by-product comes out of a process covered under the EU food registration, this paragraph (4.0) does not apply. The

Topic	Requirement/condition	Explanation/guidance
Scope & application		
		regular scheme requirements apply.
Who must apply this protocol?	<p>Any certified company which is involved in the production and trade of these feed products falling under the scope of this protocol.</p> <p>This company must comply with the relevant requirements of this protocol.</p>	For traders this practically means that they must forward product information and analyses results which are requested by this protocol.
Requirements for producers and traders		
Shipment, supervision and sampling	<p>When shipped by sea vessel or barge, shipment shall be performed according to international recognized trade accepted contract (FOSFA, NOFOTA, GROFOR) to assure:</p> <ul style="list-style-type: none"> - Independent supervision - Sampling per lot - Safe previous cargoes and technical equipment 	<p>This assures that shipment is supervised by an independent accredited cargo superintendent</p> <p>A lot is an expression which is particularly used when shipping by boat or vessel. A lot can be divided on several holds. A lot is often documented by a Bill of Lading.</p> <p>A batch is more used to indicate a certain volume of product originating from a production process.</p> <p>Safe previous cargoes and technical equipment as per FOSFA requirements.</p>
	<p>When shipped by vehicles (tank/container):</p> <ul style="list-style-type: none"> - sampling of each truck 	<p>Individual samples must be labelled, sealed and stored correctly.</p> <p>Batches ('truckloads') may be stored together in a tank, which must be tested before delivery. Positive release before delivery.</p>
Testing	Batch by batch	<p>100% positive release.</p> <p>Batches/lots need to be tested before used in feed. Producer of the by-</p>

Topic	Requirement/condition	Explanation/guidance
Scope & application		
		product is responsible unless agreed (in contract or another official document) to transfer this responsibility for testing to his customer. They must also agree that results are shared. Representative test results need to accompany any delivered batch, also to customers.
	Carried out at a certified laboratory complying with the EFISC-GTP requirements (paragraph 4.4.3.3 of EFISC-GTP code 4.0 or paragraph 4.4.3.3 of EFISC-GTP code 3.1)	Note: Spiking must be added directly on the sample before sample extraction, confirmation single spikes should be carried out on unexpected residues. Accreditation must include the specific parameter and matrix
Parameters to be analysed	<ul style="list-style-type: none"> - Fatty Acid profile - Moisture and impurities - Free Fatty Acid - Melting point 	Results shall match the profile of the product and the quality standard of the producer.
	<ul style="list-style-type: none"> - Dioxins, dioxin-like PCBs, non-Dioxin-like PCBs - Pesticides - Heavy metals (Arsenic, Cadmium, Mercury, Lead and Nickel) - Mineral oil - PAH's 	Levels must not exceed the limits as laid down in Directive 2002/32/EC and EFISC-GTP sector document on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining. Pesticides conform Reg. (EU) No. 396/2005 and based on own risk analysis.
Labelling	Product name (including botanical origin) and number according to Reg. (EU) No 68/2013, as amended, must be declared (see Annex 1 to this protocol)	Labelling requirements applies for all origins, EU and non-EU. Note: GMO labelling must also comply with EU legislation.
	When it concerns composite product, names and numbers of all ingredients must be mentioned.	Specification of oils and fats products including the catalogue numbers and the botanical origin.

Topic	Requirement/condition	Explanation/guidance
Scope & application		
Transfer of information	Information, which is generated as a result of application of this paragraph, must be unambiguous and must accompany every batch / shipment to demonstrate that requirements have been met.	

6.2.2 Specific requirements for soap stock splitters

Specific purchase requirement for soap stock splitters	Requirement/condition	Explanation/guidance
Sourcing of raw materials for soap stock splitters (acidulators)	Clear contracts with specification of incoming raw materials	A clear contract is a commercial contract with clarity about the contractual parties involved and it should contain all relevant specifications of the in-coming raw materials. The soap stock splitters are to be considered as a starting point in the assured chain.
	Raw materials to be used: - Wet gums out of processing food/feed grade oil (GMQ) - Soap stock out of first generation GMQ vegetable oil (chemical refinery). - Soap stocks from neutralisation process (derived from GMQ oil to be used in biodiesel production).	This is from GMQ crude vegetable oil which quality is also used to process refined oils for human consumption. Note that the oil which is used in biodiesel production is only partly refined, meaning only neutralized. Bleaching and deodorization is normally not part of the biodiesel process.
	Raw materials not be used (negative list): - By-products from biodiesel production (e.g. MONG) - soap stocks out of multi feedstock biodiesel. Multi feedstock means non-GMQ vegetable oil. In this case besides oils/fats from vegetable origin, also fats/oils from animal origin or UCO used to produce the biodiesel	This negative list should be literally stated in the purchase contract of the soap stock splitter and the suppliers of the raw materials to the soap stock splitter

	<ul style="list-style-type: none">- Tank bottoms- Regained oil from bleaching earth- Deodistilates- Skimming fats from a water treatment processing (e.g. POME)- Fats from animal origin	
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Annex 1: Product name and number according to Re (EU) No 68/2013

Number	Name	Description	Examples of products falling under this number
13.6.1	Acid oils from chemical refining ⁽³⁾	Product obtained during the deacidification of oils and fats of vegetable origin by means of alkali, followed by an acidulation with subsequent separation of the aqueous phase, containing free fatty acids, oils or fats and natural components of seeds, fruits such as mono-, and diglycerides, lecithin and fibres.	
13.6.2	Fatty acids esterified with glycerol ⁽⁴⁾	Glycerides obtained by esterification of glycerol with fatty acids. May contain up to 50 ppm Nickel from hydrogenation.	
13.6.3	Mono di and tri glycerides of fatty acids ⁽⁴⁾	Product consisting of mixtures of mono-, diand triesters of glycerol with fatty acids. They may contain small amounts of free fatty acids and glycerol. May contain up to 50 ppm Nickel from hydrogenation.	
13.6.4	Salts of fatty acids ⁽⁴⁾	Product obtained by reaction of fatty acids with at least four carbon atoms with calcium, magnesium, sodium or potassium hydroxides, oxides or salts. May contain up to 50 ppm Nickel from hydrogenation.	Analysis should be done on the fat component (e.g. PFAD) of on the end-product.
13.6.5	Fatty acid distillates from physical refining ⁽³⁾	Product obtained during the deacidification of oils and fats of vegetable origin by means of distillation containing free fatty acids, oils or fats and natural components of seeds, fruits such as mono- and diglycerides, sterols and tocopherols.	

Number	Name	Description	Examples of products falling under this number
13.6.6 ¹¹	Crude fatty acids from splitting ⁽³⁾	Product obtained by oil/fat splitting. By definition it consists of crude fatty acids C 6 -C 24 , aliphatic, linear, monocarboxylic, saturated and unsaturated. May contain up to 50 ppm Nickel from hydrogenation.	
13.6.7 ¹⁰	Pure distilled fatty acids from splitting ⁽³⁾	Product obtained by the distillation of crude fatty acids from oil/fat splitting potentially plus hydrogenation. By definition it consists of pure distilled fatty acids C 6 -C 24 , aliphatic, linear, monocarboxylic, saturated and unsaturated. May contain up to 50 ppm Nickel from hydrogenation	<p>Ricinoic acid (syn. Castor oil acid), CAS no.141-22-0, EC no. 205-470-2</p> <p>Icosa-5,8,11,14-tetraenoic acid (syn. Arachidonic acid), CAS no. 506-32-1, EC no. 208-033-4</p> <p>Hexanoic acid (syn. Caproic acid) of vegetable origin, CAS no.142-62-1, EC no. 205-550-7;</p> <p>Octanoic acid (syn. Caprylic acid) of vegetable origin, CAS no.124-07-2, EC no. 204-677-5</p> <p>Oleic acid (syn. octadec-9-enoic acid) of vegetable origin, CAS no. 112-80-1, EC no. 204-007-1</p> <p>Linoleic acid (syn. 9,12-Octadecadienoic acid), CAS no. 60-33-3, EC no. 200-470-9</p> <p>Linolenic acid (syn. (9Z,12Z,15Z)-9,12,15-Octadecatrienoic acid), CAS no. 463-40-1, EC no. 207-334-8</p>

¹¹This product is out of the scope of this protocol (paragraph 4.0) only in case it is produced from fatty acids from splitting of vegetable oil and fats falling under the Catalogue of feed materials number 2.20.1.

Number	Name	Description	Examples of products falling under this number
			Stearic acid (syn. octadecanoic acid) of vegetable origin, CAS no. 57-11-4, EC no. 200-313-4
13.6.9	Mono- and diglycerides of fatty acids esterified with organic acids ^{(4) (5)}	Mono- and diglycerides of fatty acids with at least four carbon atoms esterified with organic acids.	
13.6.10	Sucrose esters of fatty acids ⁽⁴⁾	Esters of saccharose and fatty acids.	
13.6.11	Sucroglycerides of fatty acids ⁽⁴⁾	Mixture of esters of saccharose and mono and di-glycerides of fatty acids.	
13.11.2	Mono-esters of propylene glycol and fatty acids ⁽⁴⁾	Mono-esters of propylene glycol and fatty acids, alone or in mixtures with diester	
<p>(1) The name shall be supplemented by the species.</p> <p>(2) The name shall be supplemented by the plant species.</p> <p>(3) The name shall be supplemented by the indication of the botanical or animal origin.</p> <p>(4) The name shall be amended or supplemented to specify the fatty acids used.</p> <p>(5) The name shall be amended or supplemented to specify the organic acid.</p>			