

EFISC.GTP

Purchase of certified sustainable feed material

Version: 3.0 of 07/06/2023

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1. Introduction

Understanding the origin of raw and feed materials, and the conditions under which they are cultivated and processed is becoming increasingly important. Operators want to demonstrate compliance with requirements regarding health and safety, as well as environmental, social and quality-related aspects, while consumers or other end users need to be able to trust the claims made for these products. The main drivers are government policies, consumer and business demand. Companies directly active in a chain of custody (e.g. producers, traders, logistic and transport) as well as those investing in such companies (e.g. financial institutions, governments) need transparency to understand and manage risks, to secure quality and to facilitate the implementation of a reliable chain of custody system.

2. Scope

This document contains requirements for the assurance of responsible feed production and trade. It contains system requirements and supply chain modules used for the handing of responsible feed. It can be used by feed traders starting with the collection and feed producers who purchase, process, handle and sell responsible feed.

A prerequisite for the adoption of the requirements contained in this document is that the company is certified against the EFISC-GTP standard for the scope D, or F or G¹.

The primary production (for example the cultivation of soybean or corn, etc..) does not fall into the scope of this document. To this, the recognized standards covering the primary production shall be defined and declared by EFISC-GTP. For the cultivation of soybean, accepted standards are indicated in the **Annex 1**.

Company certified against the EFISC-GTP standard for the scope D, or F or G, are not obliged to adopt this module.

3. Terms and definitions

In addition to the terms and definitions mentioned in the <u>EFISC-GTP standards</u> (see **paragraph 2.6.1**), the following terms are used in this document:

Chain of custody: process by which inputs and outputs and associated information are transferred, monitored and controlled as they move through each step in the relevant supply chain

Chain of custody system: set of measures designed to implement a chain of custody, including documentation of these measures

Chain of custody model: approach taken to control inputs and outputs and associated information in a particular chain of custody system

Book & Claim:

Supply chain model in which the administrative record flow is not necessarily connected to the physical flow of material or product throughout the supply chain. This chain of custody model is also referred to as "certificate trading model" or "credit trading". This is often used where the certified/specified material cannot, or only with difficulty, be kept separate from the non-certified/specified material, such as green credits in an electricity supply(Source: ISO 22095).

Mass balance: chain of custody model where the participants must ensure that the output of certified responsible feed supplied to customers does not exceed the input of certified sustainable

¹ transport and storage activities linked to sustainable product trading activities are not falling under the scope indicated in this module.

feed received at the location. The participant is allowed to buy both certified sustainable feed and un-certified feed.

Inventory balancing system: the internal mechanism which an organization uses to track data related to certified sustainable feed material. This could be a database.

Responsibility data

Relevant information about the product, such as:

- information about the area of origin of the certified sustainable raw material and or feed material
- adopted supply chain model

These data must be recorded in the material accounting system.

Segregation: chain of custody model where the certified sustainable feed is kept physically separated from the uncertified feed throughout the entire supply chain.

Source: originator of a raw material or by-product with specified characteristic (for example a supplier of feed)

Supply chain model: a model which describes how certified sustainable feed is handled within the feed supply chain. These supply chain models describe the flow of certified sustainable feed and what each individual link in the chain must control in order to deliver certified sustainable feed.

Certified Sustainable raw and/or feed material: material that meets the certification requirements indicated in this module

Identity preserved model: chain of custody model in which the materials or products originate from a single source and their specified characteristics are maintained throughout the supply chain.

4. Labelling

Labelling of products in EFISC-GTP follows the indications provided in the **paragraph 4.3.9** of the <u>EFISC-GTP standard</u>. Information about EFISC-GTP companies adopting this module must be clearly visible in their EFISC-GTP certificate: see annex 2. More detailed information on the labelling system is available in the annex 3.

5. Responsibilities and human resources

The organization's top management shall establish and document its commitment to implement and maintain the chain of custody requirements in accordance with this document. The commitment of the organization shall be made available publicly and to the organization's personnel, suppliers, customers and other stakeholders where relevant.

The organization's top management shall:

- assign responsibility and authority for ensuring the chain of custody system conforms to the requirements of this document: a responsible person or department must be appointed to handle certified sustainable feed material
- allocate adequate and appropriate resources to carry out their commitments, including competences needed and the training of personnel and monitoring of the organization's implementation of its chain of custody system
- determine the necessary competences of person(s) doing work under its control that affect the performance of its chain of custody system
- ensure that these persons are competent on the basis of appropriate education, training, and/or experience, where applicable, take actions to acquire the necessary competence, and evaluate the actions taken
- determine the training needs to be provided: these shall be reviewed at least annually

- retain documented information as evidence of competence (2 years)

6. Control of documented information

The organization shall establish and maintain documented information in order to demonstrate conformance with all applicable requirements in this document. Information from external organizations or other stakeholders deemed necessary for planning, operation and management of the chain of custody shall be identified.

For the control of documented information, the EFISC-GTP organization shall at least define:

- a) adequate protection (e.g. from breach of confidentiality, improper or malicious use, or loss of integrity);
- b) storage and preservation, including preservation of legibility;
- c) change(s) in version;
- d) retention period shall be at least 2 years.

7. Outsourcing

The EFISC-GTP organization active in the chain of custody shall have responsibility for all outsourcing and contractors related to the organization's chain of custody. The organization's chain of custody shall include all outsourced operations. This includes those involved in the manufacturing of materials or products whether onsite or offsite. The organization shall establish written outsourcing agreements with their contractor(s). If contracted manufacturers are commissioned by the company, it must be ensured that they are also certified against this document or against a recognized standard (in case of soybean or soybean by-products, see **Annex 1**).

8. Acceptable sustainable raw material.

Since this module does not cover the primary production, sustainable raw material may be purchased from suppliers certified against recognized standards covering primary production: the recognized standards must be defined and declared by EFISC-GTP. For the sourcing of soybean, the accepted standards are indicated in the **Annex 1**. Book and claim sustainable credits (in case of soybean **RTRS credits**) are also acceptable when covering a corresponding quantity of non-certified sustainable raw material (see paragraph 13 and 15.4).

9. Supplier evaluation

Since this module does not cover the primary production, raw material shall be sourced from supplier certified against recognized standards covering the primary production: the recognized standards must be defined and declared by EFISC-GTP. For the sourcing of soybean, the accepted standards are indicated in the **Annex 1.** See paragraph 13. Contractual agreements with suppliers must be established.

10. Traceability

Feed material that is traded, processed, or handled as sustainable feed material within the scope of this document must be traceable, including the applied supply chain model. The EFISC-GTP company must take suitable measures to ensure that the products can be traced during the stages for which the certified company is responsible. The adopted chain of custody model shall be mentioned on the shipping documents.

11. Complaints and incidents procedure

The EFISC-GTP company active in the chain of custody shall ensure that complaints received regarding the organization's conformity to the requirements applicable to the scope of the organization's chain of custody system are considered. Also, incidents (possible incidents could be nonconformities in the sourcing or during processing or marketing of certified sustainable feed material) shall be managed according to this procedure.

The complaints and incidents procedure shall at least provide that the EFISC-GTP certified company:

- acknowledges the receipt of the complaint to the complainant;
- investigates the complaint and specifies its proposed actions in response to the complaint;
- notifies the complainant if more time is needed to complete this investigation;
- takes appropriate actions with respect to complaints and any deficiencies found in processes that affect conformity to the requirements;
- notifies the complainant when the complaint is considered to be adequately addressed and closed;
- notifies the complaint and sand the incidents to EFISC-GTP. For the incidents, in the notification the following information shall be described: causes, planned and implemented measures;
- complains and incidents shall be included in the annual management review.

A responsible contact person for critical incidents must be indicated by the EFISC-GTP certified company. This information shall be available for the auditor.

12. Internal audits and management review

Internal audits shall be performed to verify the implementation of criteria described in this procedure as well as possible corrective actions deriving from previous audits and findings from the complaint management. The EFISC-GTP company shall define the scopes and the methods of the audits. This internal audit could also combined with the internal audit as described in the **paragraph 4.4.6** of the <u>EFISC-GTP standard</u>. Results of the internal audits as well as supplier evaluation and complaint management shall be evaluated in a management review.

13. Sourcing of certified sustainable raw and feed material

In order to be certified according to this module, the EFISC-GTP company has to purchase certified sustainable raw and/or feed material as indicated in the sub-paragraph 13.1 and 13.2.

As an alternative to purchasing certified sustainable feed material, the EFISC-GTP company can also purchase uncertified sustainable material and compensate it by purchasing sustainable credits (in case of soybean, for example RTRS credits) via the chain of custody model Book&Claim: see paragraph 15.4.

13.1 Purchase of unprocessed material

As indicated in paragraph 2, the primary production (for example the cultivation of soybean or corn, etc..) does not fall into the scope of this document. To this, the recognized standards covering the primary production shall be defined and declared by EFISC-GTP. For the sourcing of soybean, the accepted standards are indicated in the **Annex 1.** Contractual agreements on this must be made with the supplier of unprocessed/processed material. The EFISC-GTP company must check whether the delivered unprocessed material is correctly labelled: material that is not clearly labelled as certified sustainable material may not be used for further processing/trading.

13.2 Purchase of processed material

For the purchasing of processed material, the recognized standards shall be defined and declared by EFISC-GTP. In case of purchasing of processed products from soybeans, the products in the scope of this document are the ones indicated in the paragraph 2 of the <u>Sector reference document on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining - Version 4.0.</u>, from the Catalogue of feed material number 2.18.2 to 2.18.14. Moreover the supplier shall be EFISC-GTP certified according to this module or against a recognized scheme (see Annex 1). Contractual

agreements on this must be made with the supplier of processed material. Supply chain model-specific requirements are explained in subsequent paragraphs (see paragraph 15).

The EFISC-GTP company must check whether the delivered processed material is correctly labelled: material that is not clearly labelled as certified sustainable material may not be used for further processing/trading.

14. Handling of certified sustainable feed material

14.1 Inventory balancing system

Within the chain of custody, the quantities received and supplied to customers shall be reconciled within a defined accounting period in order to verify that the outputs relate appropriately to the inputs. The EFISC-GTP company (producers or traders) active in the chain of custody shall document the total quantity (volume or mass or units) of materials or products received and supplied to customer within the appropriate specified time frame. The documentation shall include:

- stock remaining from the previous accounting period;
- inputs received;
- inputs still in stock;
- outputs still in stock;
- outputs supplied to customer.

14.2 Conversion factors

The conversion factor shall be defined for each material or product with specified characteristic at each site depending on the processing or handling performed.

The EFISC-GTP organization shall ensure that the conversion factor is accurate and justifiable. The conversion factors used within each processing facility are determined by the EFISC-GTP companies and are indicated in documented information relating to the processing of the material or product, and kept up-to-date. The calculation methodology for conversion factors must be specified.

The conversion factor must be reviewed at least annually and recalculated in the event of relevant changes affecting the production processes.

15. Chain of custody models

The EFISC-GTP company certified against this module, shall implement and maintain a chain of custody system adequate to the organization's type and complexity to ensure the continuous conformity to all applicable chain of custody requirements. The list of chain of custody models, ranked from highest to lowest physical presence of the specified characteristics is illustrated in the following figure 1.

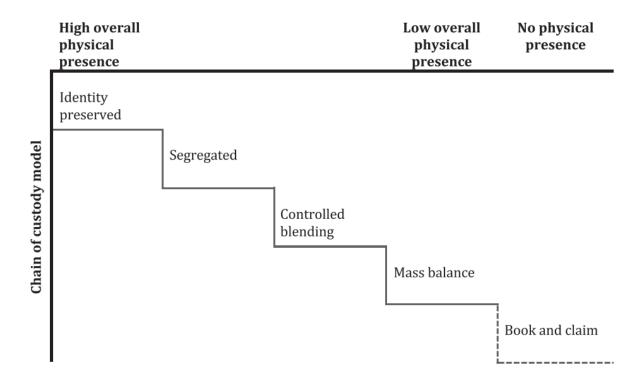


Figure 1. Indicative illustration of chain of custody models ranked according to the physical presence of specified characteristics. *Source: ISO 22095:2020*

The chain of custody models adopted by EFISC-GTP are: Identity Preserved, Segregation, Mass Balance and Book&Claim.

Note: In case of soybean or soybean's by-products, as of 30 December 2024, the obligations deriving from the **EU Regulation 2023/1115 of 31 May 2023** on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation, will come into force and as a consequence all suppliers of soybean and by-products delivering material to the EU countries, need to be verified for the EU deforestation free rules, with a cut-off date of 31 December 2020.

15.1 Identity Preserved (IP)

The identity preserved model is a chain of custody model, in which the inputs originate from a single source. In the identity preserved model, the material is kept physically separated and the characteristics are maintained throughout the supply chain. Products are clearly identifiable throughout the supply chain as originating from the single source. The specified characteristics of the product determined by the specific source it originates from shall be maintained by the EFISC-GTP companies active in the chain of custody. The product can be traced all the way back to the source from which it originates. The identity preserved material must be stored in clearly defined storage facilities so that a mix-up with non-identity preserved material is excluded. To avoid mixing in storage facilities, a release procedure must be established before a change of product.

15.2 Segregation (SEG)

The segregated model is a chain of custody model in which, from initial input to final output, the specified characteristics are maintained. Inputs from different sources may be mixed, based on identical characteristics. However, the identity of any particular source might be lost.

In the segregated model, materials certified against this module or certified in accordance with the standards indicated in the annex 1 (in case of soybean or soybean's by-products) are kept physically separated and their characteristics are maintained throughout the supply chain. The inputs will have identical characteristics but may have different sources.

The EFISC-GTP company must source identity preserved (IP) or segregated (SEG) feed material from an EFISC-GTP company certified against this module or certified in accordance with the standards indicated in the **Annex 1** (in case of soybean or soybean's by-products).

The EFISC-GTP company must ensure the physical separation of segregated material and non-segregated material (indications on segregation are provided in the **paragraph 4.3.9** of the <u>EFISC-GTP standard</u>). The segregated material must be stored in clearly defined storage facilities so that a mix-up with non-identity preserved material is excluded. To avoid mixing in storage facilities, a release procedure must be established before a change of product.

15.3Mass Balance (MB)

The mass balance model is a chain of custody model in which materials or products with specified characteristics are mixed with materials or products without some or all of these characteristics, resulting in a claim on a part of the output, proportional to the input. Within the chain of custody model Mass Balance:

- the mixing of certified sustainable material and uncertified sustainable material is possible
- there are no requirements for the physical separation of products
- in the inventory balancing system (see paragraph 14.1), a balance must be created between the amount of certified sustainable material and outputs. Identity Preserved and Segregated certified products can be mixed with mass-balanced products

The EFISC-GTP company must source mass-balanced material from an EFISC-GTP company certified against this module or certified in accordance with the standards indicated in the annex 1 (in case of soybean or soybean's by-products).

The collection of mass-balanced feed material in the inventory balancing system must be carried out via a continuous balancing system or for a fixed inventory period.

a. Continuous balancing system

Where a continuous balancing system is in operation, the EFISC-GTP company shall ensure that:

- the quantity of physical mass balanced material inputs and outputs (in volume or weight) at the physical location are monitored on a real-time basis
- the quantity of material (volume or weight) at the physical location is at least the same as the quantity of responsible feed material (volume or weight) available for allocation to outputs in the inventory balancing system
- the inventory balancing system is never negative

Only responsibility data which has been recorded in the inventory balancing system shall be allocated to outputs supplied by the participant.

Responsibility data is valid for 24 months from the date it was first recorded in the inventory balancing system. If the participant does not allocate the available quantity of responsibility data to outputs (conversion of the mass balanced material into outputs) within 24 months, the data shall expire and shall be deducted from the inventory balancing system

b. Fixed inventory period.

Where a fixed inventory period is in operation, the EFISC-GTP company shall ensure that:

- the quantity of mass balance material inputs and outputs (volume or weight) are balanced within a fixed inventory period which does not exceed one year (12 months)

- the overdrawing of the mass balanced material is possible if there is evidence that purchases are under contract for delivery within the inventory period, to cover the output quantity supplied.

Responsibility data which has not been allocated to output material at the end of the inventory period can be carried over and recorded in the inventory balancing system for the following inventory period. Carried-over responsibility data is valid for 24 months from the date of the inventory. If the EFISC-GTP company does not allocate the available quantity of responsibility data to outputs within 24 months, the data shall expire and shall be deducted from the inventory balancing system.

The EFISC-GTP company shall ensure that the inventory balancing system is not overdrawn at the time of the inventory. Only responsibility data which has been recorded in the inventory balancing system within the inventory period (including the carried-over from the previous inventory period) shall be allocated to outputs supplied within the inventory period.

15.4Book & Claim (B&C)

The Book & Claim model aims to ensure that for each purchase for which a claim is made, feed materials with the same specified characteristics have been produced. The Book & Claim model is an alternative chain of custody model in which the administrative record flow is not connected to the physical flow of materials or products throughout the supply chain. After production of the sustainable material, the information on specified characteristics within the supply chain is decoupled from any material or product. Sustainable credits are issued when the sustainable materials enter the market. The credits maybe traded and sold independently of the physical delivery of materials or products.

EFISC-GTP companies that buy/produce non-sustainable certified feed material on the regular market can purchase certified sustainable feed material credits directly from growers (in general from an independent issuing body: in case of soybean, for example RTRS credits). These credits are equivalent to sustainable production of a certain amount of certified sustainable feed material.

Credits shall be reliably controlled and double counting of credits shall be avoided at all times. The credits shall be cancelled as soon as they have been redeemed, based on use or consumption of corresponding output. Credits shall expire after a defined period of time (usually set by the requirements setter).

The collection of Book & Claim feed material and credits in the inventory balancing system must be carried out via a continuous balancing system or for a fixed inventory period.

a. Continuous balancing system

Where a continuous balancing system is applied, the EFISC-GTP company shall ensure that the quantity of credits inputs and outputs are monitored on a real-time basis. The following indications apply:

- The EFISC-GTP company must collect the amount of purchased credits to compensate the uncertified sustainable feed material in real time
- The EFISC-GTP company must collect the physical feed material Book & Claim received (inputs) and delivered (outputs) (volumes or weight) in real time
- Purchased credits shall be registered in the accounting system
- The accounting system must not be overdrawn

- If by-products are produced, this must also be applied proportionately to Book&Claim sustainable material in accordance with the conversion factors of the physical goods (see paragraph 14.2)
- The quantities of Book&Claim sustainable material compensated with credits registered in the accounting system can be allocated to physical goods retroactively for a maximum of 24 months from the time of in-put registration. If it is not possible for the company to allocate these registered Book&Claim feed material quantities to physical products within that time frame, they expire as certified quantities and must be deleted from the balancing system.

b. Fixed inventory period.

Where a fixed period is applied, the EFISC-GTP company shall ensure that the quantity of credits inputs and outputs are balanced within a fixed period of time. The following indications apply:

- A fixed inventory period corresponds to a maximum period of 12 months. During this period, Book&Claim feed material inputs and outputs can be balanced out. By acquiring credits, the EFISC-GTP company can balance out the uncertified sustainable inputs within these 12 months and allocate the quantities to outputs.
- Selling more Book&Claim output than available in the inventory balancing system is only possible if there is proof that a Book&Claim certified inputs will be contractually secured during that inventory period to compensate for the sold outputs or credits for the corresponding quantity are purchased at the end of the inventory period to balance the quantities in the inventory balancing system.
- Book&Claim feed material that has not been sold in the inventory period can be carried over to the next period. These transferred quantities must be used within 24 months. If this is not done within that time frame, they expire and must be deleted from the accounting system.
- Credits acquired by the EFISC-GTP company can also be carried over into the next period. If it is not possible for the company to allocate these registered credits to physical outputs, they expire from the accounting system and must be deleted.
- At the end of the inventory period, the balance sheet in the inventory balancing system must not be negative.

16. Centrally organized purchasing for companies with several sites

In case of company with several trading sites or production sites, these sites can also organize the purchase of sustainable certified material in the main location.

This shall be clearly indicated and documented. More specifically, the following information shall be available for the auditor:

- the different responsibilities among the different sites
- the activities concerning purchasing and the flow of goods
- quantity increases and decreases must be traceable and verifiable for each site according to the indications provided in the *paragraph 14.1*: quantity balancing must be ensured at all sites.

The main location and the other sites must have been audited against this module.

17. Additional Rules of Certification

As indicated in paragraph 2 of this module, a prerequisite for the adoption of the requirements contained in this document is that the company is certified against the EFISC-GTP standard for the scope D, or F or G.

Training for auditors follows the indication provided in the paragraph 3.1.3.2 of the EFISC-GTP Rules of Certification.

With reference to the requirements indicated in this module, the verification of conformity by the EFISC-GTP Certification Bodies should be carried out during an initial/surveillance/recertification audit as indicated in section 7 of the EFISC-GTP Rules of Certification. In this case the minimum additional audit time must be 1.5 hours. The same minimum additional audit time should be applied in the case of the main location described in paragraph 16.

In exceptional cases (for example in the case of companies that have the urgency to operate in this sector), it is possible to carry out an independent verification of conformity: it is necessary that the company already possesses a valid EFISC-GTP certificate. Only in this case, the EFISC-GTP Certification Body, in agreement with the company, can carry out the verification in the form of a desk study or remote audit, following the instructions provided by EFISC-GTP: minimum audit time must be 2.5 hours.

Annex 1

The certification standards required for the primary production of raw material, which are recognized by EFISC-GTP, contains criteria for the responsible treatment of people, nature and the environment in the countries where the raw material is grown.

In the specific case of soybean, recognition is given to sustainability standards for primary production that are compliant and recognized to the requirements of the FEFAC Soy Sourcing Guideline 2021 (https://standardsmap.org/en/identify?client=FEFAC) in content and have an appropriate inspection system: this sustainable certification of soybean cultivation includes ecological criteria (e.g. deforestation-free cultivation, protection of water bodies, reduction of water consumption, proper disposal, erosion control), economic criteria (e.g. legal compliance, good agricultural practices) and social criteria (e.g. prohibition of forced labour, child labour and discrimination, regulated working hours, minimum wages, rights of indigenous peoples, freedom of assembly).

For companies delivering to the QS scheme, the QS - Annex 4.2 (Recognized standards for soybean production) and QS - Annex 4.3 (Recognized chain-of-custody standards) shall be considered.

Annex 2: Text for certificate

Information about EFISC-GTP companies adopting this module must be clearly visible in their EFISC-GTP certificate. Referring to the Annex 5 of the EFISC-GTP Rules of Certification, the following additional information (highlighted in grey) must be added to the EFISC-GTP certificate:

- the company is certified according to the requirements indicated in this module
- scope for sustainability
- adopted chain of custody model (IP, SEG, MB, B&C)
- ▶ list of feed materials that are certified according to the requirements of this module.

EXAMPLE:

Name Company [Name site] Name CB [Name CB]

Name Site Address CB [Address CB]

Adress Site [Name site] [Location, country]

[Address site]

Certificate [Location, country]

number [Certificate number]

This document serves to certify that [NAME SITE] has implemented and maintains a Feed/Food Safety Management System including Good Manufacturing/Hygiene Practices (GMP, GHP) in compliance with the EFISC.GTP feed /food safety assurance Code version 4.0 and the Starch Europe/FEDIOL/COCERAL/EBB/Euromalt/Other sector document version Y and the EFISC-GTP Module Purchase of certified sustainable feed material:

Scope D [Scope of certification: Production of X, Y, Z, including the (intercompany)purchasing of the incoming material, plant storage, transshipment, manufacturing, (intracompany)sales and transport of the feed ingredient (delete what is not applicable)]

Scope G/F [Scope of certification: Product handling of product group X,Y,Z, including collection, storage, trading and transport of feed/food ingredients (delete what is not applicable)]

Scope for Sustainability: Production/handling of X, Y, Z, (*) including the (intercompany) purchasing of the incoming material, plant storage, transshipment, manufacturing, (intracompany) sales/trading and transport of the feed ingredient.

Adopted chain of custody model: IP/SEG/MB/B&C

Annex A of this certificate provide the locations covered under the multi-site certification (when applicable)

The compliance was determined in accordance with the EFISC.GTP Rules of Certification version 4.0.

This certificate is valid from [DATE] until [DATE]

First issued at [DATE]

Authorized by: [NAME AND FUNCTION CERTIFICATION MANAGER CB]

For the validity of this certificate please check www.EFISC.GTP.eu

Accreditation stamp

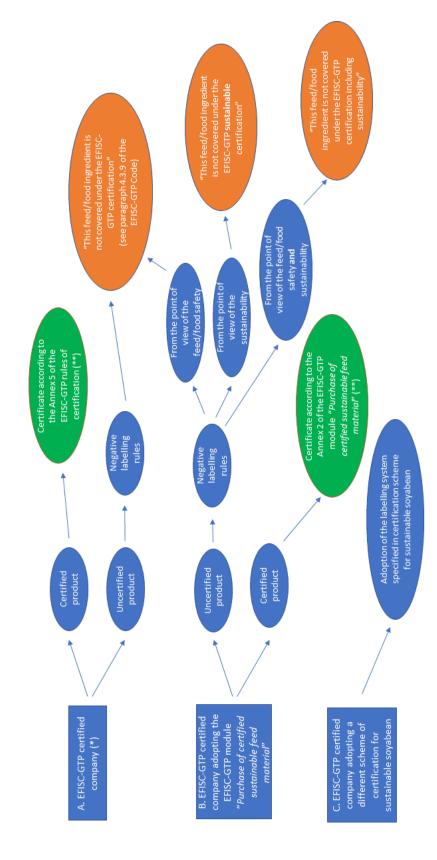
Annex A- The following sites are covered under this certificate (name, location, scope)

Notes

(*) In case of soybean and/or by products, the certified sustainable materials must be clearly indicated in the certificate according to the information provided in the paragraph 13.1 and 13.2 of this module.

NOTE: EFISC-GTP Certification Bodies can decide to deliver a separate certificate for the scope of sustainability.

Annex 3: Labelling system



(*) As of 1/01/2024, EFISC- GTP certified companies, producing/trading soybeans and/or their by-products, that do not adopt a certification system for sustainable soyabean not recognized by the QS scheme (**) to facilitate the exchange of sustainable feed material certified according to this module with other certification schemes, the EFISC-GTP operator, in a context of negative labelling, can voluntarily declare that the product is certified.

References

- Isael Alliance Chain of custody models and definitions
- ISO 22095:2020 Chain of custody General terminology and models
- FEFAC Soy Sourcing Guideline 2021