



GMP⁺ Certification Scheme 2006 Questions & Answers Production, Trade, Storage & Transhipment (GMP B1, B3 & B5)

This questions and answers list addresses many subjects which are related to the GMP⁺ certification scheme. These include the general classification and participation / application. In addition, many questions are related to purchasing and approved suppliers in which the focus is on the interpretation of the requirements. Finally, attention is paid to a number of smaller questions.

Note: the major changes compared to the previous version have been shaded in grey. For new questions and answers or those which have been greatly modified, only the question is shaded in grey.

During an information day on 25 January 2006 the Product Board provided more information on the changes. Various presentations were held during this day. These presentations are available in [Dutch](#), [English](#) and [German](#). Although it is now some time ago, these presentations still contain useful information.

In addition to this Q&A list there are also other [Q&A lists](#) which address specific GMP⁺ subjects, namely:

- Q & A Feed Materials Risk Assessment Database
- Q & A Quality Control of Feed Materials (GMP B2)
- Q & A Cultivation of Feed Materials (GMP B6)
- Q & A GMP Road Transport Animal Feed Sector (GMP B4.1)
- Q & A GMP08A Transport by Inland Waterway (GMP B4.3)



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The GMP⁺ scheme in general

1. What is the structure of the GMP⁺ certification scheme 2006?

The scheme has been divided into three groups:

- A: Basic documents (requirements for participation and applications by companies and certification bodies)
- B: Standards and appendices
- C: Supervision and certification (requirements for approval of certification bodies and assessment and sanctions for participants).

With respect to section B there is no longer a basic standard and additional standards. All the requirements which a company must meet are in 1 standard. There are also requirements in the appendices which mean further detailing of the requirements in the standard.

With respect to trade and production, no distinction is made any more between the various types of animal feed (feed materials, feed additives, premixes and compound feeds).

For the general layout of the new GMP⁺ standards and the associated appendices, please refer to a number of slides in the Powerpoint presentation "[Production feeds](#)". These slides include the new GMP⁺ documents.



2. Why are there also appendices with requirements and conditions in addition to the standards?

The appendices address specific parts of the standard(s). There are, for example, appendices on Product Norms and appendices for Monitoring and for Purchasing, etc. There are references to any of these appendices from within more than one standard.

The inclusion each time of the same requirements in more than one standard is not easy from the control point of view. In addition it makes the standards more inaccessible and larger. Because of this – and also for other reasons – it was decided not to include certain (detailed) requirements in each of the various standards but to record it in an appendix (in a single place) and to refer to this from the standard itself



3. Where are the Japan standard and the regulations for grass-fed chickens and free-range animals?

The Japan standard no longer exists. All the relevant requirements related to the making of feed for Japan have been fully integrated into the new GMP⁺ standard B1 and into the appendices, especially Appendix 1 Product Norms. All GMP⁺ pig feeds comply with the Japanese requirements.

This means, among other things, that no customer register needs to be maintained of customers who supply pigs for export to Japan. The label also no longer needs to have the designation 'Meets Japanese standards'.

The additional regulations for grass-fed chickens and free-range feed still exist. They have been included in the standards GMP B9.1 and GMP B9.2. and can only be applied in combination with GMP B1.

4. Which modifications to the content have been made as a result of the adoption of GMP⁺:2006?

Requirements and conditions have also lapsed, been changed or been added. This is because use was made in writing the new standard of the ISO-9001 norm from the year 2000 and the HACCP criteria for foodstuffs from the year 2002. The most important changes to the content arose however from the full integration of the Animal Feed Hygiene Regulation into the GMP⁺ standards. Changes have also been made on the basis of experience gained in the GMP⁺ certification scheme 2003.

It would go too far to give all the changes here in detail. A summary follows which therefore is not complete in every detail:

a) As a result of the new ISO 9001 (2000):

- New chapter classification with more emphasis on the cohesion between the processes
- More attention for the responsibility of the top management when it comes to achieving feed safety
- Management should ensure that there are sufficient resources available (personnel, materials, etc.) to produce or trade animal feeds safely

b) As a result of the new HACCP

- More attention to basic requirement programmes required for being able to apply HACCP successfully
- General control measures are a part of these programmes
- The requirement for validation: prior determination that a newly-introduced control measure works

c) As a consequence of the Feed Hygiene Regulation

- More attention to compliance with a number of basic requirements. These are primarily focused on personnel, buildings & equipment and hygienic working

d) As a consequence of experience with GMP⁺2003

- The term basic quality has been converted into feed safety
- Fewer mandatory procedures, lists and overviews A company has more freedom to show that it complies with the requirements.

For a more complete overview See the Powerpoint presentation "[Production of Feeds](#)".



5. Will anything change for my manual, procedures or other documents?

The changes will depend to some extent on the activities of your company. It should be clear that your quality system complies with the new requirements. You may decide to modify your quality system in accordance with the layout of GMP⁺ 2006 and you may also make it clear by way of a cross-reference table that you have complied with the requirements of GMP⁺ 2006. The PDV has made a [cross-reference table](#) as a tool. These indicate in general where elements of the old standards have been included in the new standards.

6. What is the scope of the GMP⁺ standards?

The GMP⁺:2006 scheme continues to adapt. Improvements are continually being made as a result of suggestions by participants in order to match (international) developments. All these changes and modifications sometimes make it difficult to establish and maintain a good overview and to be able to make good choices among standards. An attempt has been made to provide an overview in the table below.

Basic standard

In the GMP⁺:2006 scheme there is one main standard, namely GMP B1. This standard describes the requirements and conditions for all forms of trade, production and processing of all types of feeds (feed materials, feed additives, premixes and compound feeds). In addition to the production of animal feeds this also includes: storage and/or transshipment of animal feeds, drying and cleaning of grains, packaging or bagging of animal feeds, etc. Once a company carries out a physical action in some way with an animal feed then he may apply GMP B1. Some companies can also choose to assure their activities via a combination of other standards such as trade and storage using B3 and B5.

The requirements for *transport* are (for various reasons) included in a number of separate standards, the GMP B4 series. A company which, for example, produces feeds and brings them to the customer should guarantee this transport via GMP B4.1.

Custom-work

Especially for companies which carry out limited activities with one or a few types of feeds, there are the so-called custom standards. These standards focus exclusively on one or a few activities and/or types of feed. Only the requirements and conditions which are necessary for this are included. Examples of custom standards are (in addition to the GMP B4.x series for transport referred to above):

- A standard for the production of feed materials (GMP B2)
- A standard for trade (GMP B3)
- A standard for the distributive trades (GMP B3.2). The introduction of this standard means that the so-called guarantee arrangement for brokers (on the basis of GMP Appendix 11) will expire with effect from mid-2009. For more information refer to the Q&A list [‘GMP+ B3.2 distributive trading in feeds for direct delivery to cattle farmers’](#)
- A standard for storage & transshipment (GMP B5)

The classification of the GMP⁺:2006 scheme is shown in the following table.



Standard	Scope	Products	Intended for:	Remarks
Main standard				
GMP B1	Production and processing activities including trade and storage & transhipment. No transport	Of all feeds and of all services except transport	Producers and processors of <ul style="list-style-type: none"> - Compound feeds - Premixes - Feed additives - Feed materials Traders Storage companies Collectors/processors of grains, etc.	Quality system may relate to multiple sites where one or more of the activities referred to take place. The title of the standard does not match the scope very well
'Custom' standards				
GMP B2	Production Trade and storage Storage & transhipment (as service for third parties) Collection	Of feed materials Of all feeds Of all feeds Of grains, seeds and legumes	Industrial producers of feed materials, traders in feeds, storage & transhipment companies, collectors	Only to be applied outside the Netherlands
GMP B3 (2006)	Trade	Of all feeds	Traders	
GMP B3 (2007)	Trade Collecting trade Storage and transhipment	Of all feeds Of grains, seeds and legumes Of all feeds	Traders, collectors and storage companies	
GMP B4.1	Road transport	Of all feeds	All companies which transport feeds by vehicle.	
GMP B3.2	Distributive trade	in compound feeds and feed materials	brokers who trade feeds directly on to cattle farmers	
GMP B4.2	Affreightment of short sea shipping and inland waterways	Of all feeds	Charterers of short sea shipping and inland waterways	
GMP B4.3	Inland Waterways Hygiene Code	Of all feeds	Shippers ('carriers')	
GMP B4.4	Affreightment of sea transport	Of all feeds	Carriers of sea transport	Only in combination with GMP B1
GMP B4.5	Rail transport affreightment	Of all feeds	Rail transport customers	Only in combination with GMP B1
GMP B5	Storage and transhipment	Of feeds	Storage and transhipment companies	



Standard	Scope	Products	Intended for:	Remarks
GMP B6	Cultivation including simple physical treatment of feed materials	Of feed materials	Arable farmers	
GMP B7.1	Storage, custody and feeding on poultry farms	Of feeds	Poultry farmers	Is integrated into Integral Chain Management
GMP B7.2	Storage, custody and feeding on pig farms	Of feeds	Pig farmers	Is integrated into Integral Chain Management
GMP B 8	Production and Trading	Of pet foods	Producers and/or traders in pet foods.	
GMP B 9.1	Special Regulations for Grass-Fed Chickens	Grass-fed chicken feed	Producers and traders in pet foods.	Only in combination with GMP B1 or GMP B3
GMP B 9.2	Special Regulations for Free-Range Animals	Free-range animal feeds	Producers and traders in pet foods.	Only in combination with GMP B1 or GMP B3
GMP B 10	Laboratory testing	Analyses	Laboratories	



7. What are the most important definitions in the GMP⁺ Certification Scheme for the Animal Feed Sector 2006?

A long list of definitions is included in document A2. The most important definitions are:

Feeds: All substances and products including feed additives which are processed, partially processed or unprocessed which are intended for use in the oral feeding of animals (Dir. (EC) no. 178/2002). This includes feed materials, premixes, feed additives, semi-manufactured products, compound feeds or products which may be designated as such following a processing operation.

Products (or feed products): All substances intended for use as, or processed in, feed for animals. Within the GMP⁺ standard the scope of this definition includes feeds and also, for example, veterinary medical products and processing aids

Semi-finished product: Mix of at least 2 feed materials which may or may not be additives intended for processing in compound feed or intended for use as a carrier in a premix. The production of this should be assured under GMP B1

Trade: Activity where products are bought and/or sold

Production: Activity where there is a physical handling of the animal feed.

8. Why has the GMP⁺ certification scheme been changed?

The major reasons for the change are:

- There is a new ISO standard available, ISO 9000:2000
- The HACCP foodstuff criteria have been updated, HACCP 2002;
- From the sector there is a requirement to make the GMP⁺ certification scheme more accessible and user-friendly than the GMP Regulation 2003 (more logical order, remove duplicates)
- There is a lot of international interest in joining the GMP⁺ certification scheme developed by the PDV. A review was necessary for the GMP⁺ certification scheme to be more internationally accepted
- Change to Animal Feed Hygiene Regulation (Reg. (EC) no. 183/2005);
- Making worthy of accreditation

When drawing up the new GMP⁺ Certification Scheme for the Animal Feed Sector 2006 account was also taken of the experience with the GMP⁺ Certification Scheme for the Animal Feed Sector 2003. This led to the GMP⁺ Certification Scheme for the Animal Feed Sector 2006 complying with national and international requirements, to it being applicable to the whole animal feed column and to it being 'Animal Hygiene-proof'. A GMP⁺-certified company 'automatically' complies with this regulation.

The GMP⁺ Certification Scheme for the Animal Feed Sector 2006 is supported by the animal production chain.



9. Will there now be no changes for a time in this new GMP⁺ certification scheme?

It is unfortunate but changes will continue to be necessary in the future although the intention is only to make changes when necessary.

These changes will relate to the content of individual standards and also to the structure of the complete scheme (such as scope and application).

There are various reasons for further changes being applied. The most important of these are:

- International developments ([question 10](#))
- Wishes of both participating companies and certification bodies ([question 11](#)).
- The implementation of agreements which were made in the past such as the replacement of the GMP B2 standard ([question 12](#) and further)



10. What changes may be expected due to international developments?

There are many developments currently in Europe especially in the field of (the control of) feed and food safety. This is a result of the new Hygiene Regulations which were adopted a few years ago and in which the development and the use of Guides for Good Practice are stimulated. GMP⁺ is not the only scheme in the field of feed safety in Europe; comparable schemes are being developed in many parts of the food/feed sector.

Where possible GMP⁺ looks for cooperation in promoting transparency and harmonisation. An almost unavoidable consequence is that the GMP⁺ scheme has to be amended.

There is currently a specific cooperation with Coceral with the intention of fully harmonising the current GTP code and the GMP B3(2007) standard (trade) with respect to content (including the certification requirements). The expectation is that concrete results will only be able to be announced next year.

GMP⁺ has also been declared interchangeable with (parts of) other schemes and an extension of this may be expected in the coming period. Refer also to GMP Appendix 10. Attention is also paid to this elsewhere in this Q&A list.



11. What changes may be expected due to the wishes of the participants?

Many thousands of companies and certification bodies participate in the GMP⁺ scheme and they work in various parts of the feed sector. Participants are located in all sorts of countries around the world. In short this is a wide, global range of participants.

Each of these participants has its own wishes and desires and many questions are asked on a daily basis and useful suggestions for improvement are made. It has never been usual in the GMP⁺ scheme to ignore these suggestions and there has always been a willingness to listen to participants and to develop and implement improvements. Here too however, every improvement means an amendment.

In the coming years changes will primarily consist of deleting many so-called means requirements ('detail requirements'). These are requirements which support a general objective requirement. Many means requirements (including with respect to EWS, recall, tracking & tracing and management statement, legislation and conditional non-complying products,) are included in the GMP appendices. In fact these are guidelines and aids. They give guidance to companies in the correct formulation of their control systems.

The deleting of the means requirements will have to be done in careful consultation. Essential elements should be retained.

The deleting does justice on the one hand to emphasis which is now also laid by the legislation on a company's own responsibility: a company is itself responsible for the quality and safety of its products.

On the other hand, in recent years companies have invested greatly in quality assurance. Expertise and the level have risen enormously. This fits with a scheme with standards in which to achieve an objective ('feed and food safety') the requirements are formulated more in general terms than is now the case. The companies are then able to determine themselves more how they demonstrably comply with these requirements. Objectives requirements demand a different attitude from both the companies and the auditors.

Work is also being done on the following sections:

- Monitoring
- Gatekeeper options within the framework of supplier control / purchasing
- Sampling protocols
- HACCP manual



12. What changes may be expected due to agreements made earlier?

A number of changes which were agreed during the setting up of GMP⁺:2006 have not yet been implemented. A specific example of this is the updating of the current GMP B2 standard which is applied to, among others, producers of feed materials.

The content of this GMP B2 standard is almost the same as the previous versions (GMP13 or QC).

Many storage and transshipment companies, traders and collectors now also use this standard. This standard was not originally developed for these companies and, in spite of all sorts of amendments, it is still not properly attuned to these target groups. The intention is to make improvements on this item in the coming time. Modification is also necessary to maintain a good match with other GMP⁺ standards and with the current legislation.



13. When will the current GMP B2 standard be updated?

During the adoption of GMP⁺:2006 (in mid-2005) it was decided that the current GMP B2 certificates would be valid until the end of 2008 if they were issued before the end of 2006. Some time later this decision was amended so that certificates which were issued before the end of 2007 would still be accepted until the end of 2008.

It is now clear that these dates are also not realistic end dates. The Expert Committee has therefore decided to review its original decisions to a great extent. This amounts to the following: the GMP B2 will remain in the GMP⁺ scheme. It will be drastically revised but an exact date has no longer been established.

The content of the updated GMP B2 standard will be based on the IFIS standard. It will be much like GMP B3(2007) in its structure and layout.

14. What changes have been made in the Spring of 2008?

Some changes were made to a number of standards in the Spring of 2008. To summarise, these were the following:

- GMP B1/B3 Modification of the requirements with respect to the taking of retention samples within the framework of tracking & tracing
- GMP B1/B2/B3 Addition of the requirement that the selling party (for example a trader) must make the status ('GMP+' or 'non-GMP+') known of the traded feed in sales contracts and/or sales confirmations.
- GMP B3.2 new standard for the distributive trades. Refer to the separate [Q&A list](#)
- GMP B8 Complete review of the standard in accordance with the FEDIAF code
- GMP B10 Serological classification for Salmonella
- GMP Appendix 1 Inclusion of action and rejection limits for certain salts, modification of the mycotoxin norms, improvement of the designation of the former Japan norms, addition of information on a number of veterinary drugs and the scrapping of a number of non-critical veterinary drugs and/or products for which there is no longer a registration of their processing in feed.
- GMP Appendix 13 The sampling protocols have been finished after a long period of preparation.



15. Must the updated GMP B3(2007) now be applied?

As indicated above, many traders, collectors and storage companies also use the current GMP B2. There is now a new standard for them: GMP B3(2007). As the current GMP B2 will continue to be valid for longer (end date is not yet determined!), these companies **are not obliged** to cross over now and they can also continue to make use of the current GMP B2. They may however cross over if they wish to do so.

This information deviates from previous statements (such as for example the lecture on this subject during the Information Day 12 June 2007 in Hanover) and it is advisable to pay proper attention to it.



PRODUCTSCHAP DIERVOEDER

16. Where can I find the new standards and appendices?

Like the old standards, the new standards have been published on the PDV website. Consult the PDV website for the [GMP⁺ certification scheme 2006](#)



17. How do I know which standards and appendices I have to apply?

It is important that you first describe the activities ('actions' or 'processes') you carry out and with which feeds. In each standard this actually one of the first requirements to be set (art. 4.1 from, for example, the standards GMP B1, GMP B3(2006), GMP B5 and GMP B4.1). You can therefore determine quite quickly which standard(s) apply to you.

From these standards you will then be referred to the applicable appendices.

The table in [question 6](#) may be of help.



18. May I exclude requirements and conditions?

A requirement may well have the status 'not applicable' for a participant. Examples: If the participant does not manage the property of customers then the *Property of Customers* requirement lapses. If a participant does not work with critical additives or veterinary medical products then the requirement to measure their carry-over lapses. In other words: a participant may exclude requirements. He should, of course, provide reasons for the exclusion. The exclusions may in any event not lead to the participant supplying animal feeds which do not comply with feed safety as defined in the GMP⁺ certification scheme

No requirements may be excluded because the participant finds them to be not relevant such as because customers do not ask for them or because compliance with these requirements is not a legal obligation.

Purchasing, suppliers and supplier control

This section contains some explanations and interpretations of some of the requirements from the GMP⁺ Certification Scheme for the Animal Feed Sector 2006, in particular with respect to purchasing.

A [Q&A list Quality Control of Feed Materials](#) has been published in English on the website especially on the regulations for foreign suppliers of feed raw materials who mostly take part in the GMP⁺ Certification Scheme for the Animal Feed Sector 2006 by way of standard [GMP B2](#). This Q&A list handles to some extent other subjects than are covered in the Dutch Q&A list.

19. What does the GMP⁺ Certification Scheme for the Animal Feed Sector 2006 require with respect to the quality assurance of raw materials?

The companies which deliver feed materials to GMP⁺-certified compound feed mixers and to suppliers of single feed materials (who in turn deliver to livestock farms) must also have a certified quality system and must ensure the guaranteeing of the safety and quality of the raw materials which are intended for animal feed. In other words: all links in the chain should be certified. This is a basic requirement of the GMP⁺ scheme.

A distinction is currently drawn between a) domestic purchasing (meaning the purchase from a supplier/producer in the Netherlands) and b) purchase from a company abroad.

- re. a). If a GMP⁺-certified animal feed company or supplier buys raw materials from a trader or producer in the Netherlands then it must be GMP⁺-certified (in accordance with GMP B1, GMP B3(2006) or GMP B3(2007) (with the scope: feed materials) See the following questions for more on this.
- re. b) The certification obligation also applies to purchases from a foreign raw material supplier. In addition to a GMP⁺ certificate in accordance with GMP B1, GMP B3(2006) or GMP B3(2007) (with the scope: feed materials) there is also the possibility for the foreign producer to be certified in accordance with GMP B2. GMP B2 is the earlier QC standard. See the English-language [Q&A list Quality Control of Feed Materials](#) on this subject.

In both situations a GMP⁺-certified company may also purchase from a producer who has implemented a quality assurance system which has been declared by the Product Board Animal Feed to be equivalent or acceptable and has been certified as such.



20. What requirements does a feed materials supplier established in the Netherlands have to meet if he wants to obtain GMP⁺ certification?

The trader or producer of feed materials and/or raw materials is eligible for a GMP⁺ certificate if he complies with the relevant norms and requirements of the GMP⁺ Certification Scheme for the Animal Feed Sector 2006. These norms and requirements are laid down in the GMP⁺ standards GMP B1 or GMP B3 and the associated appendices.

A GMP⁺ certificate is issued by a certification body approved by the Product Board Animal Feed if it is demonstrated that all GMP⁺ requirements have been met. For more information please refer to de [PDV website](#)



21. How do I know which companies are GMP⁺-certified?

The Product Board Animal Feed publishes those companies which are GMP⁺-certified in a public register on its web site. These companies are entitled to sell feed products in the animal feed sector. Companies are included in this register if the approved certification body states that the company in question complies with the requirements of the GMP⁺ standard.

A GMP⁺-certified company may purchase products from those companies which are in the [register](#).

Note: A supplier who shows you an ISO or HACCP certificate does not comply with the conditions set for suppliers in the GMP⁺ Certification Scheme for the Animal Feed Sector 2006. The scope of the ISO or HACCP certificate is actually limited to the production of the main flow of the company. This is (often) foodstuffs. In GMP⁺ there is in fact a determination of whether the waste flows (which go to the feed sector) comply with the GMP requirements. It is therefore definitely necessary that the certification agency also determines the GMP equivalency of the waste flow in accordance with the criteria which have been drawn up and certified by the Product Board Animal Feed!



22. Which companies now go on to the list of certified suppliers on the PDV website?

Only certified companies are specified in the [register](#) for a scheme administered by the PDV. The PDV does not specify suppliers of feed materials in its list who have been certified on the basis of another (approved) scheme as specified above (for example Ovocom, AIC). There are however links to the websites of the organisations involved on the PDV website so that these websites can be consulted quickly.

The above shows that the PDV list is an aid in establishing whether suppliers have the required qualifications.

23. Which suppliers are qualified to be able to supply feed materials to GMP⁺-certified companies?

The supplier of feed materials to GMP⁺-certified companies should use one of the following forms of quality and safety assurance and be certified accordingly:

- 1) The GMP⁺ Certification Scheme for the Animal Feed Sector 2006, or
- 2) an (equivalent) quality system approved by the PDV.

These options are explained briefly below. Only suppliers which demonstrably comply with one of these options are sufficiently qualified to supply feed materials to GMP⁺-certified companies. In a number of special situations feed materials may also be purchased from a non-certified supplier. Special requirements have been established for this which must be complied with.

Note: In all of the situations mentioned the supply of feed materials to GMP⁺-certified companies should take place by way of GMP⁺-certified transport.

1) GMP⁺ certification scheme:

The supplier of feed materials is certified in accordance with one of the following standards:

- GMP B1, B2 or GMP B3 (with the scope feed materials)
- GMP B6 Also see [question 31](#).

Companies which are certified in accordance with GMP⁺ Certification Scheme for the Animal Feed Sector 2006 are specified in the public [register](#) which can be found on the PDV website (www.pdv.nl).

2) Accepted quality assurance certificates:

A number of standards and certificates are accepted or have been declared to be compatible. Acceptance means that this supplier may deliver to GMP⁺-certified companies, compatibility goes a step further and means that the GMP⁺ company may also deliver in the chain in question. For some standards and certificates they are declared to be accepted or compatible under certain conditions. There is often an additional requirement that the transport is GMP⁺-certified and that a risk assessment is published in the DRV database

For a full overview of standards and certificates which have been declared accepted or compatible please refer to [Appendix 10](#).

24. What requirements apply for the use of foodstuffs as animal feed?

The GMP⁺ requirements for purchasing ([Appendix 10](#)) state that foodstuffs without a GMP⁺ certificate may be processed if:

- the foodstuff has been produced under a HACCP system
- is as such suitable for human consumption
- complies with the relevant animal feed legislation

The College will go into this in more detail.

It should be noted that many foodstuff companies should certainly be GMP⁺ certified for their regular waste flow and should remain so. They would be wise, if this applies to their company, to define other 'types' of foodstuff (production faults, returns, etc) and to include them in GMP⁺ quality assurance. They can then sell these as animal feed in the GMP⁺ chain

In any event the following 'types' are not meant:

- waste flows which are created in the production of foodstuffs
- production faults, expiry date products, etc.
- feed additives for foodstuffs
- raw materials for the production of foodstuffs

It also does not matter whether foodstuffs are designated with the term 'foodstuff quality' or 'food grade'. These terms are not defined in GMP⁺.



25. What actually is a Gatekeeper?

The basic option for purchasing in GMP⁺ is that it is done from a certified supplier. In various specific situations it is also possible to purchase from a non-certified supplier. In these cases the purchaser (the GMP⁺-certified company) is considered to be a Gatekeeper.

The various gatekeeper options are in GMP Appendix 10. Characteristic is that additional requirements have been set with which this form of purchasing must comply.

The Gatekeeper is unable to have confidence in the GMP⁺ certificate of the producer because this producer does not have one. He must therefore pay attention to and ensure a number of essential extra points. Entry check (often batch check) often forms an important additional requirement in addition to carrying out a risk analysis.

The general policy line with respect to the Gatekeeper is that this principle may only be applied in very exceptional cases for specific products and/or companies and preferably on a temporary basis ('case by case'). The main requirement for purchasing is and will remain that all links in the chain must be certified.

There are gatekeeper requirements for

- Feed additives
- Unprocessed agricultural products and products derived from them which come from the grower
- Some specific feed materials
 - o grains, seeds and legumes from certain origins¹
 - o Intervention grain
 - o Palm oil²

For a complete overview see [Appendix 10](#)

¹ This is the old action plan for the quality assurance of grains, seeds and pulses

² This is the old action plan for the quality assurance of palm oil



26. Should I report when I purchase a feed material or a feed additive under gatekeeper conditions?

The requirements for the purchase of these products for you as Gatekeeper are included in the purchasing conditions in the GMP⁺ certification scheme. It is sufficient if you can demonstrate to the certification body that you have met these requirements.

You do not therefore have to report unless you purchase raw palm oil under Gatekeeper conditions. See [Appendix 10](#) for this. You should be registered with the Product Board Animal Feed (Coordinating Office for Animal Feed Certification and Monitoring (BCD)). This registration just serves to be able from time to time to carry out a proper evaluation.



27. As a Gatekeeper may I carry out audits at my suppliers?

Yes, you can. If the Gatekeeper function requires that you carry out audits at the producers for whom you wish to provide a guarantee then you can determine for yourself how you meet these requirements. It is not actually necessary, for example, to have an independent body carry out these audits. It should of course be someone who knows what they are doing. You should demonstrate this to the satisfaction of the certification body.



28. Where does the animal feed chain actually begin or in other words which companies have to obtain a GMP⁺ certificate to be able to deliver products to GMP⁺-certified traders and animal feed producers?

Many companies are involved in the making of safe animal feed. A company where a product is created which is intended for processing in animal feed already has to conform to the GMP⁺ requirements and conditions and be GMP⁺-certified.

These may be foodstuffs companies but they may also be chemical companies or companies in the fermentation industry. Also see for a number of examples the document [‘Where does GMP+ certification begin’](#)



29. What are the interpretations of the requirements for purchasing if I, as a foodstuff company, wish to obtain a GMP⁺ certificate for the quality assurance of my waste flow?

The GMP⁺ certificate is issued for the waste flow if the quality assurance which is applied to it complies with the GMP⁺ requirements. The scope of the GMP⁺ certificate contains the assurance from the moment of creation of the waste product (the feed material).

This includes all the activities, actions and/or processes which precede the actual creation of the feed material and those which may influence the safety of the feed material in the HACCP risk assessment. In this connection the foodstuff company should also set requirements for the quality and safety of the raw materials which it purchases but these do not have to come from GMP⁺-certified suppliers.

The company should realise that in addition to food a product is created which will be used as feed. The HACCP system used should guarantee the purchase of safe raw materials for the production of both feed and food.

30. What is the Protocol for the Acceptance of Dutch Hygiene Codes for the Foodstuff Sector?

The board of the Product Board Animal Feed adopted in February 2004 the *Protocol for the Acceptance of Dutch Hygiene Codes for Foodstuff Sectors*.

This protocol describes a procedure where the owner of a hygiene code (for example a branch organisation) can have this code accepted within the framework of the GMP⁺ Certification Scheme for the Animal Feed Sector 2006.

The foodstuff companies may – if a hygiene code is accepted by the Product Board Animal Feed – deliver their waste products on the basis of this hygiene code to GMP⁺-certified companies as a raw material for animal feed.

Important conditions for the approval of a hygiene code are:

- Conditions are also included in the hygiene code for the guaranteeing of the residual product. These correspond to the GMP⁺ conditions
- The method of supervision is comparable to the supervision under the GMP⁺ Certification Scheme for the Animal Feed Sector 2006.
- There may be no direct delivery to livestock farmers. In that case the foodstuff company should obtain a GMP certificate

For more information see the [protocol](#) (Dutch version).

31. What should I do when I buy raw materials from a grower?

It is not obligatory to purchase from a grower who is GMP⁺-certified. Other forms of quality assurance for cultivation are also permitted. This enables the farmer to participate in a cultivation quality assurance programme which is relevant to him. It is then the duty of the GMP⁺-certified customer to map out on which parts of the cultivation the grower has a proper quality assurance as required by GMP⁺ and which areas are not yet properly quality assured or perhaps not at all. The customer should take proper measures in this latter situation to ensure control. This method of working falls under the so-called Gatekeeper principle.

Summary:

GMP⁺-certified customers may purchase agricultural crops from:

1. a grower who is certified in accordance with GMP B6,
2. a standard which has been determined to be equivalent to GMP B6. Refer to Question 9 of the [Q&A list for cultivation](#) (only in Dutch and German)
3. a grower for whom he guarantees the safety of the feed material supplied by the grower under his own GMP⁺ certificate (Gatekeeper). The requirements which are set for this are included in GMP Appendix 10. Refer to Question 32 in this [Q&A list](#)

32. What is meant by the Gatekeeper Principle when I buy raw materials from a grower?

The GMP⁺-certified customer guarantees the safety of the feed material supplied by the grower. This means that the GMP⁺-certified customer should demonstrate during an audit that the purchased products are GMP⁺ worthy. The grower remains responsible for the (quality of the) products supplied. Demonstrability under GMP⁺ lies however with the GMP⁺-certified customer.

The GMP⁺-certified customer should together with the grower (demonstrably) show compliance with the following requirements:

- a) determination of which quality assurance is used by the grower
- b) carrying out of a risk assessment for the purchased product (at the grower from sowing up to and including harvesting including any processing, storage and/or transport)
- c) implementation of a proper entry check programme further to items a and b.
- d) recording of the above in the form of agreements. In Appendix 1 and Appendix 2 there are sample Gatekeeper agreements (1a arable products general and 1b specifically for feed potatoes).

These requirements are included in [Appendix 10 Purchasing](#)

Note: These requirements apply if untreated agricultural products are purchased *for feeding to animals*. And not if they are bought for the production of foodstuffs. These foodstuff companies may also be GMP⁺ certified for the production of by-products which they sell in the animal feed chain. The purchasing requirements which then apply are specified in [question 28](#).



33. Does a broker or commission agent also have to have GMP⁺ certificate?

If a broker or commission agent trades raw materials on its own account then he is a trader and should have his own GMP⁺ certificate. If the broker or commission agent only acts as a mediator then he is not the legal owner and does not have to have his own GMP⁺ certificate.

Note: In some districts of the Netherlands (for example Groningen) traders sometimes call themselves commission agents. These persons or companies must of course have a GMP⁺ certificate



34. What is the status of the Database of Feed Materials Risk Assessments (DRV)?

The Dutch animal feed sector, in close cooperation with the animal production chain, finally decided in 2003 to assume in future the use of 'known' feed materials. In this context this means that the risks which might occur during the production of these feed materials are controllable.

The basic assumption is in fact that, under the GMP⁺ Certification Scheme for the Animal Feed Sector 2006, a feed material (from a particular production process) may only be used if a (generic) risk assessment has been recorded in the Feed Materials Risk Assessment Database (DRV) of the Product Board Animal Feed.

GMP⁺-certified companies may only use feed materials for which a risk assessment has been published. Of course, these feed materials must come from a GMP⁺-certified company.

Feed materials will only be eligible for inclusion in the Feed Materials Risk Assessment Database if they meet all the legal requirements and the risks are sufficiently controllable. This must be shown by a risk assessment which must comply with the established criteria ([Appendix 2](#));

The [Database of Feed Materials Risk Assessments \(DRV\)](#) has been moved to the Login section and is only accessible to GMP⁺-certified companies. See also the [Question&Answer List](#) about this



35. Must a risk assessment for feed additives also be published in the Database of Feed Materials Risk Assessments (DRV) (GMP B1, Art. 7.11.1)

Feed additives do not have to be included with a risk assessment in the Database of Feed Materials Risk Assessments (DRV). Naturally, during the purchase of the feed additives they must be permitted in the sense of EC/2003/1831 (see for example this [document](#)) and must be purchased in accordance with the GMP⁺ requirements.



36. I have a new company. How can I consult the Database of Feed Materials Risk Assessments (DRV) ?

The DRV database can only be consulted by participants in the GMP⁺ Certification Scheme for the Animal Feed Sector 2006. Once a company has been certified and has been notified by its certification body in the Certified Companies Database, then this participant will receive an access code and password with which it is possible to consult the protected DRV database.

Applicant participants have no access to the DRV database. In order however to be able to make use of the information which is relevant to them in the DRV database (including the checking on whether their own production process corresponds to what is recorded in the generic risk assessment in the DRV database, GMP B1, § 7.3.1), the college has decided that the Product Board Animal Feed may, at the request of these applicant participants, send the details so that they can be used in the implementation of the HACCP analysis.



37. I am a supplier of feed additives (Regulation (EG) no. 1831/2003) and special nitrogenous products (Directive 82/471/EG). Must I also have a GMP⁺ certificate?

With effect from 1 January 2006, these products may only be processed and used by GMP⁺ certified companies. This means that these products should come from GMP⁺-certified companies or from companies which are certified under a scheme which has been declared equivalent. A third option is that these products can be purchased and processed under Gatekeeper conditions.

This decision was taken after extensive discussions with all the involved parties, both national and international. The requirement only to accept certified feed additives with effect from 1 January 2006 also applies to participants in the quality regulations in Belgium, Germany and the United Kingdom.

For GMP⁺ certification traders and producers of the products in question can apply the GMP⁺ standard GMP B3 or GMP B1 (with the scope: feed additives). These products will also be accepted from companies which are certified on the basis of a feed additives standard of Ovocom (Belgium) or FEMAS (United Kingdom) or FAMI-QS.

Note: The above does not apply to (mixtures of) silage additives. See Q&A list B6 Cultivation of Feed Materials, Question 10.



38. What about compatibility between GMP⁺ and FAMI-QS?

An agreement has now been entered into between these organisations. This regulates, among other things, mutual recognition for both feed additives and premixes. On the basis of this agreement, certificates which are issued under the two schemes are fully equivalent to one another. Consequently, the participant may, without any additional requirements, purchase from companies which are certified under the other scheme.



39. I do not deliver my (waste) products which are intended for animal feed directly to a livestock farmer but to a trader. Which quality assurance must I apply?

If a foodstuffs company sells its waste products which are intended for feed to the livestock farmer via a trader deliver then these products are considered to be feed materials (in accordance with the animal feed legislation). This means that the foodstuff company requires to have a GMP⁺ certificate.

The trader gives the products the destination 'animal feed' and should also have a GMP⁺ certificate. If the trader is the last link for the livestock farmer then he should also comply with the requirements for sampling and analysis. The above also applies if the products are transported directly from the producer's location to the livestock farmer.



- 40. What requirements apply to a GMP⁺ certified trader who purchases from raw material suppliers/producers located abroad?**

Please refer to the English-language [Q&A list Quality Control of Feed materials](#).

Other subjects

41. Must I carry out analyses under GMP⁺?

Yes, but what and how many depend on the type of product and the position in the chain in which the company is located

Both the animal feed legislation and the GMP⁺ Certification Scheme for the Animal Feed Sector 2006 set product norms with respect to animal feeds. Animal feeds should comply with these norms.

No requirements are set in the animal feed legislation for the frequency of analytical inspection. GMP⁺ does however require a minimum frequency. This is done within the framework of making it demonstrable that the feed material complies with the statutory norms and the additional GMP⁺ norms. The requirements which are set for the examinations are included in [Appendix 4](#).

Minimum frequencies for sample taking and analysis are included in this appendix for various parameters. This minimum duty of analysis applies:

- in addition to the company's own monitoring programme which is expected under the HACCP.
- especially to GMP⁺-certified companies which supply products to livestock farmers. These suppliers may of course make use of the analysis data from producers, for example, if this data complies with the GMP⁺ rules. The analyses must also have been carried out by a laboratory which is approved under the GMP⁺ Certification Scheme for the Animal Feed Sector 2006 and the analyses are carried out in accordance with the method in the [Feed Research Documentation Bundle \(Dutch\)](#). The analyses must also be representative which also means that they must be current and that custody/storage/processing must have no influence on the contents.

This document also includes the mandatory inspections in the raw materials channel for Salmonella. This is determined by the position in the chain.

In summary: The feed legislation does not set any requirements for the frequency of the analyses to be carried out. GMP does do this, especially for suppliers which supply feed materials to livestock farmers. This supplier is obliged, in addition to the monitoring programme on the basis of the HACCP analysis, to have its products examined with a certain minimum frequency for a number of parameters. The supplier may of course make use of analysis results provided by his suppliers. All GMP⁺-certified companies (from the start of the animal feed chain onwards) should in fact carry out a HACCP analysis. It is inconceivable that no monitoring programme is carried out within the framework of the HACCP analysis including by producers which are at the start of the animal feed chain. The analyses which are carried out and how often depends on the results of the HACCP analysis.

42. Which procedures are mandatory?

The GMP⁺ Certification Scheme for the Animal Feed Sector 2006 (GMP standard B1) requires documented procedures for:

- Document control (§ 4.2.3), including the administration of quality records
- **Corrective actions (taking care of deviations)** (§ 7.9.1)
- Recall (§ 7.9.2)
- Purchasing process (§ 7.11.1)
- Internal audit (§ 8.2)
- Corrective measures (§ 8.4.2)
- Preventive measures (§8.4.3)
- Early warning procedure (§8.4.4)

In addition, instructions and other documents are required within the framework of:

- Maintenance of production areas and equipment (§ 6.4.1)
- Cleaning programme (§ 6.4.2)
- Disinfestation programme (§ 6.4.3)
- The full HACCP risk assessment (§ 7.2 to 7.10)
- Communication with the customer (§ 7.3.4)
- Sampling (§ 7.8.1 and § 6.5)
- Carrying out inspections and audits (§ 7.8.1)
- Production instructions (including sequence) (§ 7.12.1.4.1)
- Instruction for working with returned products. (§7.1.2.1.5)

In addition various records should be maintained to be able to show that there is compliance with the requirements of the GMP⁺ certification scheme 2006 and that the feed safety system functions properly.



43. How long must I keep records under the GMP⁺ Certification Scheme for the Animal Feed Sector 2006?

The period of time for keeping records has been extended from 2 to 3 years. This is because the certification period has also been extended to 3 years. It may be that under other (statutory) regulations you should keep the records for longer than the prescribed 3 years.



44. How do I interpret words like 'regular', 'often', 'periodic', 'frequent', etc?

These words do indeed appear in the various GMP⁺ documents. They are not made more specific by using numbers or anything like that. It is simply not possible. Something which is more than sufficient for one company will certainly not be enough for another company. It is not possible to specify a minimum number for this in a generic sense. Companies should be responsible themselves on these points and to arrive at a certain number based on a well-substantiated reasoning.

45. Do companies which store and tranship feed materials also have to a GMP⁺ certificate?

The basic principle is that all storage including any transshipment activities is controlled with a GMP⁺ system and is certified. Various situations may be distinguished. The most important of these are discussed below.

1) A relatively simple situation is the storage of own feeds (incoming raw materials, finished product, etc) as part of the production process. This storage can be controlled using an own feed safety system (for example GMP B1 or GMP B2). This also applies if the storage takes place at other sites (owned or hired) which are part of the company. An important characteristic of this situation is that the company itself arranges and control the actual storage. In these situations any storage of packaged feed should also be certified.

2) If a company only carries out storage and transshipment as a service then this can be certified under GMP B5 or B1.

3) There are also companies which outsource the storage of products to other companies. They purchase the service Storage. This should be done from a company which is certified for this such as a company with a GMP B5 or a B2 certificate. In a number of cases storage may also be outsourced to a non-certified company. Please refer to the standards.

In these exceptional cases the participant does not actually have to outsource the storage to a certified storage company but may also do this with a non-certified storage company. He should then ensure for himself that there is GMP-compliant storage and make agreements on this with the storage company in question. Checking compliance with these agreements is included in the own quality system.

Requirements which must be met are:

- have an inspection carried out before usage of the control on feed safety
- establish that the storage and transshipment company complies with all the applicable legal obligations relating to feed³.
- Lay down agreements in a contract on the relevant prerequisites (hygiene, T&T, etc.), control measures to be carried out and audits. This should offer guarantees to GMP equivalents with respect to the storage of the feeds.
- have periodic inspections carried out of compliance with the agreements made.

Traders with storage activities do not find any requirements for the actual storage in the 'old' GMP B3(2006) standard. There is a requirement for them to control the storage (art. 4.1). See [question & answer 45](#).

³ For Europe, for example, there is a duty of registration under Reg. (EC) 183/2005.



46. I trade in animal feeds and also store them (occasionally)?

As a trader you may perhaps apply GMP B3(2006). However the actual requirements for storage are not in GMP B3(2006). This standard is in fact intended for 'pure' trade where you do not carry out the physical actions related to an animal feed yourself but outsource this.

GMP B3(2006) requests in Article 4.1a under item 8 that any storage activities are described. A trader should ensure that all activities relating to storage which take place on his responsibility are controlled. He should bring his own storage within the scope of his quality assurance system.

If a trader also does his own storage then he will find the requirements for this in, for example, GMP B1. Requirements for trade are also included in this standard. A trader with his own storage can therefore better choose GMP B1. Another option is GMP B3(2007). A trader with his own storage may also choose in addition to GMP B3 to apply GMP B5. He should then realise that he must be certified for 2 standards.

Outsourcing the storage, where the trader purchases this service and does not himself have control of the storage activity, may only be done with a company which is certified under a GMP⁺ recognised scheme. A number of specific exceptions are possible to this in which company which provides the storage does not have to be certified. The trader should then make agreements with such a company and carry out the necessary checks.

See [question & answer 44](#).

47. As a trader in forage products what should I do with respect to the requirement that I must take samples within the framework of tracking & tracing of the products supplied by me?

The new GMP⁺ requirements closely match the requirements set by the legislator and their interpretation in practice.

The legislator requires that the '*manufacturer*' takes samples (Reg. 183/2005, Appendix II). It is not always entirely clear who should be seen as the manufacturer. The interpretation of this is that '*all companies which receive products and further process them so that the products as such are not sent (= as they were received)*', should take samples taken in accordance with the Feed Hygiene Regulation.'

In the updated requirements each company should consider whether samples must be taken and how many within the framework of the above statutory requirement and its interpretation. For some companies (for example compound feed manufacturers or feed material manufacturers) there is no discussion. Other companies (for example traders) may possibly decide to take (almost) no samples. It is important that each company is aware of the consequences that sampling or not sampling may have for the company (within the framework of risk management).

Note: the above relates to sampling within the framework of tracking & tracing. It does not relate to sampling and analysis within the framework of the monitoring to be carried out or in checking if control measures have been effective. This must take place in accordance with the GMP⁺ requirements.



48. As a trading company how must I specify my feed materials when I sell my feed material futures?

In GMP⁺ every company should draw up (end product) specifications. This also applies to feed materials delivered by a trader. These specifications are based on, among other things, requirements in the legislation and from (potential) customers. The specifications must make a good hazards analysis possible which will result in a summary of the risks to be controlled. In the GMP⁺ standards a number of properties are summarised which should be specified.

A number of properties of the feed material are often already specified in standard contracts such as (a reference to) statutory requirements. This can be supplemented with other properties on the basis of direct information from the manufacturer(s) and on the basis of general knowledge of the production. The generic hazards analysis from the DRV database can also provide useful information. The scope of the description of the feed material must stretch from the ingredients used during production, the production process, etc., up to and including distribution.

The trade often purchases or sells feed materials which have not yet been produced. The trader often does not yet know (exactly) to whom he will be selling the feed material. A trader buys more or less of a certain future feed material on the basis of market estimates. The exact specification of the feed material to be sold is therefore not yet possible at the moment of purchase but should be done as well as possible. As time goes on and the product actually becomes available for delivery the missing information should be completed so that at the moment of delivery at the latest all the data should be available.

The company should inform its customers about the product (product information) such that it is also able to carry out a good hazards analysis.



49. Must I also check agreements made with third parties such as suppliers?

Yes, you must. The checking of compliance with agreements made between, for example, suppliers, should be done systematically as part of the quality system. The checking can be considered to be part of supplier assessment and control.

Control is all the more important if the agreed sections are carried out on the responsibility of the company where the supplier in question does not himself need to be certified. For example, if the storage is done at a third party, if samples are taken and kept by third parties, if feeds are purchased under Gatekeeper conditions, etc., etc.

The entry check which takes place when raw materials are delivered may also fall under this. The agreed specifications are checked.

In order to carry out a proper check it is necessary to put the agreements in writing.



50. What analyses must be carried out by a GMP B10-certified laboratory?

Analyses which must be carried out by a GMP B10 or equivalent certified laboratory are:

- all verifications and (mandatory) monitoring of product norms (both end products and raw materials)
- all official statutory obligations (for example specifications on the label)

Analyses which do not actually have to be carried out by a certified laboratory are analyses which are carried out within the framework of process controls. These include (online) NIR analyses or quick tests which are carried out to find out if processes are running in accordance with the expectations. The company carries out these checks daily. To verify their correctness a sample may be examined every quarter or every month in a certified laboratory. The same may apply to checks on correct label details.



51. What GMP requirements are there with respect to sealed containers?

Requirements are important when using sealed containers at the point of loading, transport and reception.

The feed company which loads the container is responsible for this being done correctly. This company must ensure that the prior loads can not have a negative influence on feed which is loaded into and carried in the container.

The rules which have been drawn up for the road transport of feeds (GMP Appendix 14) can form a good guide for making this assessment. The container should be clean, free of load residues and of the odour of previous loads. Information about previous loads and cleaning which has been carried out is necessary to be able to make a complete assessment.

Sealed containers are closed and sealed immediately after loading. The GMP⁺ requirements state that feed which is in sealed containers may be considered to be packaged feed. Its transport does not have to be carried out by a GMP⁺ certified carrier.

On receipt of the container the receiving company will carry out an entry check. It will verify that the products received comply with the requirements. This includes the transport and the container.

In practice this means that the company should implement a checking system where the intensity of the check may depend on a hazard assessment (new or known carrier, many/few/no complaints, critical feed material or not, etc.)



52 Pest control

52.1 What requirements are set for personnel who carry out pest control?

Section 5.1 of the standard includes requirements with respect to pest control. Under the environmental legislation the pest control must be carried out by an official pest control company or by company personnel who have a diploma for this.

What are you allowed to do without a diploma?

The placing of a (mouse) trap with bait such as cheese may be done. Or also the placing of a trap with, for example, grain to see if there really are vermin. Once there is damage and it is desired to use pesticides then the requirement applies that the company personnel must have a diploma. Traps which are placed must regularly be checked for signs of damage.

52.2 Which pesticides may I use?

For the most up-to-date list of permitted deterrents and pesticides consult the database of the Board for the Authorisation of Plant Protection Products and Biocides (CTGB) on the Internet: www.ctgb.nl

The legislation does not permit the use in a company of pesticides intended for domestic use (this is a term which was used in the old legislation and which is still used widely in Dutch 'WGGA's (legal instructions for use)! These agents may only be used in domestic circumstances in domestic areas.

If you come across such an instruction for use in which the term 'not for professional use' appears (this will appear in the new legal instructions for use) then the instructions themselves will have to state whether the agent may or may not be used in company areas by non-professionals (including agricultural workers without a training certificate).

(source: CTGB Wageningen) .

Inspecting compliance with the environmental regulations is the responsibility of the Ministry of VROM (*Spatial Planning, Housing and the Environment*).

http://www.hetInVloket.nl/cdlpub/servlet/CDLServlet?p_file_id=21358



Some questions and answers on the updated P10 protocol

The so-called P10 protocol was completely updated at the beginning of February 2008. As a result of this there were a number of questions with respect to the explanation and interpretation of certain parts of this protocol.

53. What does the protocol actually mean?

This protocol contains requirements for the purchase of grains, untreated oil seeds or legumes from a non-GMP⁺-certified⁴ chain or origin. It is to be considered to be a sort of Gatekeeper variant on the GMP⁺ prerequisite for purchasing. This prerequisite means that you may only sell feed (ingredients) from a fully-certified chain.

If a GMP⁺ company purchases specified products under the conditions of this protocol then he may sell them on under his GMP⁺ certificate. The products are 'GMP⁺-worthy'.

The protocol is not to be generally applied but only applies to the purchase of grains, (oil) seeds or legumes from certain countries.

⁴ The term 'GMP⁺-certified' also means in possession of or in the possession of another certificate accepted within the GMP⁺ scheme.



54. What has been changed in the protocol?

There has been a critical examination of the countries from which, under the requirements of this protocol, the specified feed materials may be purchased. This classification of the countries to which this protocol applies or does not apply has been changed.

This change was considered necessary due to current developments in the world grain market. There was also a critical examination of the developments in the field of (GMP⁺) certification which have taken place in certain countries in recent years.

The actual principle on which the requirements are formulated has not been touched. The basis is still the carrying out of a complete hazards analysis for the preliminary process combined with a batch control.



55. What are countries of origin?

This protocol distinguishes between countries or origins where this protocol may or may not be applied.

The *original* countries of origin have been known for years as an area or region where the feed materials (especially grains) in question are cultivated and from which they are purchased for processing in feed. Certification of the whole chain was already a prerequisite here and this remains the case. The protocol can not be applied for purchases from these countries.

Then there are the *new* countries of origin. In these countries – due to the efforts of many parties – there is now a large number of companies (collectors and traders) who have set up a GMP⁺ quality assurance system and they can offer their feed materials under the GMP⁺ certificate. Because of the increasing amount of certification among the companies these new countries of origin can within the foreseeable future be added to the list of original countries of origin. An end date has also been set for the application of this protocol.

The countries which do not belong to the original or the new countries of origin are designated as '*other countries of origin*'. A characteristic of this is that these are continuously changing countries. The companies in these countries do not yet have a GMP⁺-certified quality system. The basic principle continues to be that these other countries of origin produce the specified feed materials within a complete (GMP⁺-)certified chain. Until further notice, under the requirements of this protocol, grains, (oil) seeds and legumes can be purchased which originate from the countries in question.



56. Is purchase on the basis of this protocol a temporary option?

In GMP⁺ a decision has been made that in principle feed materials and feed additives may only be purchased from a complete certified chain. The requirements laid down in the protocol should be seen as a temporary, second opportunity to buy these products.

The intention is to consider the market situations for the feed materials in question with those directly involved each year (in August/September). An important point each time will be to establish which countries can be added to the list of 'Original countries of origin' and 'New countries of origin'.



57. How can I show that I do not have to comply with the protocol?

The GMP⁺-requirements for the purchase of untreated grains, (oil) seeds and legumes from certain countries permit various options. A GMP⁺ company does not have to apply this protocol if the product in question is from a fully assured, certified chain. In this case all the previous links will have had their responsibilities and implemented a proper GMP⁺ control system which has been certified by an independent auditor.

It is the responsibility of the GMP⁺-certified supplier which delivers the products in question from these countries to show that there is a fully-certified chain and that the protocol does not have to be applied. This means that there is information about the complete prior chain from the 1st collector, any (intermediate) storage, transport to the GMP⁺ supplier himself. This information must be available to the auditor and can also be used to provide the client with convincing information.



58. When should I sample a batch if I use the protocol?

This should be done in the country of origin, at the latest during loading of, for example an inland waterway vessel or a train. See Article 4.1 of the protocol.

The protocol may not be applied to batches which have, for example, already been transported to the Netherlands. These batches remain by definition outside the GMP⁺ circuit.



59. Must I provide monitoring data with the batches which I inspect within the framework of this protocol

The GMP⁺ requirements do not require that analysis results must always be delivered with the batches. This is also not required in this protocol. The supplier and customer should make their own arrangements for this.



60. Which points are part of the hazards analysis?

If a GMP⁺ company applies this protocol then batch control is not sufficient. A hazard analysis should be carried out for the complete preliminary process. This starts with cultivation and runs up to and including delivery to customers. The generic hazard analyses which are published in the DRV database can be an important aid in this. GMP Appendix 15 (“HACCP manual”) can be useful for the system for implementing a HACCP hazard analysis. In any event, the final monitoring plan should include the specifically specified substances in section 4.2. During the GMP⁺ audit the auditor checks the soundness and completeness of the hazard analysis and the HACCP plan.



PRODUCTSCHAP DIERVOEDER

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Should you have any more questions, please report these by fax (070-3708290) or by e-mail (pdv@hpa.agro.nl). You will receive a written response and this question will possibly be added to the list above.



Appendix 1a: SAMPLE: agreement on agricultural products between a GMP⁺ certified customer & the grower

Within the framework of participation in the GMP⁺ Certification Scheme for the Animal Feed Sector 2006, (Name of GMP⁺-certified customer) guarantees the safety of the feed material supplied by the grower. A risk assessment of the purchased product has been carried out in addition to the quality assurance used by the grower (from sowing up to and including harvest and including any treatments, storage and/or transport). A proper entry check programme has also been carried out.

To guarantee the safety of the delivered product the grower (name, address, place), declares that:

1. The agricultural products supplied by him or her are of a sound trading quality and do not present any danger to the health of persons or animals;
2. The agricultural products supplied comply with the legal standards relating to protection agents for crops and stocks;
3. Any drying and cleaning has been carried out in clean installations for that purpose;
4. The agricultural products are kept separate throughout the whole process of growing, harvesting, transport and storage from products which are not suitable for use in the feed or foodstuff chains;
5. The delivery does not contain any forbidden products such as: manure, urine, seed for sowing treated with pesticides, animal products or sludge.
6. The agricultural products must at least comply with the norms for undesirable substances and products in feed materials as specified in the feed legislation and the norms set under the GMP⁺ Certification Scheme for the Animal Feed Sector 2006 [GMP Appendix 1](#)
7. There are no proteins from mammals or processed animal proteins used during the cultivation or in the product to be supplied. Also, all measures have been taken which are necessary to prevent contamination with these animal proteins.
8. The agricultural products are treated hygienically throughout the whole production process so that the microbial quality is controlled. This is aimed at the prevention of contamination with pathogenic micro-organisms including Salmonella;
9. The means of transport in which the agricultural products are transported are clean, dry and free of remaining materials and odours from previous loads in accordance with the GMP⁺ standard for transport in the feed sector.
10. If the above-mentioned quality aspects are not complied with then (name of the animal feed producer) will be informed as quickly as possible.
11. Other requirements established by the GMP⁺ customer with respect to the risk assessment of the purchased product (from sowing up to and including harvest and including any treatments, storage and/or transport).

Place and date :

Signature :



Appendix 1b: SAMPLE agreement on feed potatoes between the animal feed producer & the grower

Within the framework of participation in the GMP⁺ Certification Scheme for the Animal Feed Sector 2006, (Name of GMP⁺-certified customer) guarantees the safety of the feed material supplied by the grower. A risk assessment of the purchased product has been carried out in addition to the quality assurance used by the grower (from sowing up to and including harvest and including any treatments, storage and/or transport). A proper entry check programme has also been carried out.

To guarantee the safety of the delivered product the grower (name, address, place), declares that:

1. The feed potatoes supplied by him or her are of a healthy, sound trading quality and do not present any danger to the health of humans or animals;
2. The feed potatoes supplied comply with the legal standards relating to protection agents for crops and stocks;
3. Any drying has been carried out in clean installations for that purpose;
4. The feed potatoes are kept separate throughout the whole process of growing, harvesting, transport and storage from products which are not suitable for use in the feed and/or foodstuff chains;
5. The delivery does not contain any forbidden products such as: manure, urine, seed for sowing treated with pesticides, animal products or sludge.
6. During cultivation or in the product to be delivered no use is made of proteins from mammals or processed animal proteins. Also, all measures have been taken which are necessary to prevent contamination with these animal proteins.
7. The feed potatoes comply with the maximum norms specified below for undesirable substances:
 - a. Heavy metals:
 - b. Arsenic 2 mg/kg
 - c. Lead 10 mg/kg
 - d. Fluoride 150 mg/kg
 - e. Mercury 0.1 mg/kg
 - f. Cadmium 1 mg/kg
 - g. Other:
 - h. Mould 10,000 kve/g
 - i. Salmonella absent in 25 grams
8. Storage is done in a proper manner so that the quality of the feed potato is influenced as little as possible. There may be no mineral oils, cleaning agents or other chemicals in the same area
9. Personnel will be given clear instructions
10. The storage area will be kept clean, dry and tidy. This area will be included in the vermin control plan.
11. The means of transport in which the potatoes are transported are clean, dry and free of remaining materials and odours from previous loads in accordance with the GMP⁺ standard for transport in the animal feed sector.
12. The grower is obliged to report any peculiarities. Only in this way is it possible for the recipient to carry out a proper risk estimation
13. If the above-mentioned quality aspects are not complied with then the customer will be informed as quickly as possible.



14. Other requirements established by the GMP⁺ customer with respect to the risk assessment of the purchased product (from sowing up to and including harvest and including any treatments, storage and/or transport).

Place and date :
Signature :