

Assessment GMP+ FRA standards

Objective of #ProjectGMP+2020

The objective of the project “#ProjectGMP+2020” is to create a clear GMP+ Feed Certification scheme which is understandable for everyone within the GMP+ Community. With this in mind, we started to literally “redesign” the GMP+ FSA module. With use of general scheme principles and writing guidelines, new draft scheme documents for the FSA module are created and published on the GMP+ International website for public consultation.

General scheme principles	Writing guidelines
<ul style="list-style-type: none"> • High level of feed safety assurance worldwide. • Primary responsibility for feed safety lies upon the participant. • Participants share the responsibility of feed safety within the whole feed chain • Alignment with internationally accepted standards • Transparency and involvement with multiple stakeholders • Independent certification. 	<ul style="list-style-type: none"> • Focus on feed safety • Be more to the point • Avoid the use of abbreviations • Don't make requirements too detailed. Focus on the goal to achieve. • Improve layout of the text (using bullets, colored text boxes, etc.)

Part of the second phase of #ProjectGMP+2020 is to use the same approach to update the FRA module as well. This memo guides through the content and the proposal of the Assessment GMP+ FRA standards.

Assessment of the GMP+ FRA standards

For the FRA standards, the same approach is followed (of course with the focus on feed responsibility instead of feed safety). As the FRA module is designed to be used as an add-on to GMP+ FSA certification, the changes made in the new 'Feed Safety Management Requirements' will be used the FRA module as well. This will have the biggest effect on the system requirements in the current B100 standard, but also some other parts of the FRA module.

The other requirements are rewritten to be more clear, up-to-date and improved with use of the writing guidelines. This memo gives a summary of the assessment of the FRA module standards, but a more in-depth assessment is available.

Proposal for GMP+ B100 Feed Responsibility Management System

Part of the document	Proposal
1.1 General	Replace with a new 'word of welcome'.
1.2 GMP+ FRA Framework & plugin market initiatives	(Align with the new GMP+ Feed Safety Management Requirements document)
1.3 Scope and application	Keep, but rewrite. (Align with the new GMP+ Feed Safety Management Requirements document)
1.4 Structure of this document	Remove – this summarizes the content of the document, but contains no requirements.
2 Normative references	Keep, but rewrite (Align with the new GMP+ Feed Safety Management Requirements document)
3 Terms and definitions	Keep (but will most likely move to a scheme-wide list of terms and definitions).
4 System requirements	This chapter contains the system requirements used to assure the correct handling of responsible feed. In the current situation, The GMP+ B100 standard follows as much as possible the FSA requirements to create a fitting add-on for GMP+ FSA certified companies. Since the FSA module is rewritten, the FRA system requirements will be adapted accordingly. See the individual Excel files for the detailed evaluation of the requirements.
5 Supply chain models	The proposal is to retain this chapter in current state.
5.1 Material accounting system	GMP+ International is part of a NEN working group to create a new ISO standard: "ISO/DIS 22095 Chain of custody – General terminology and models".
5.2 Segregation	
5.3 Mass balance	
5.4 Area mass balance	As soon as this ISO standard is finalized (publication is estimated for Q3 2020), the requirements for supply chain models will be updated accordingly.
5.5 Book & claim	The only proposed change is to <u>remove the paragraph 5.4 of area mass balance</u> . This supply chain model is in practice not used by the current market initiatives. In the upcoming ISO standard this supply chain model is also not included. Therefore it is proposed to remove this paragraph already.

Proposal for GMP+ MI documents

Below table contains a summary of the proposals for the following GMP+ MI documents:

- GMP+ MI101 Production and trade of RTRS soy
- GMP+ MI102 Responsible pig & poultry feed
- GMP+ MI103 Responsible dairy feed
- GMP+ MI105 GMO Controlled

(the proposals will also affect future MI documents)

Since the GMP+ MI documents have a similar structure, below summary is applicable for all MI documents. Please find the detailed assessments in separate documents.

Part of the document	Proposal
1.1 General	Replace with a new 'word of welcome'. Similar to the new GMP+ Feed Safety Management Requirements document.
1.2 GMP+ FRA Framework & plugin market initiatives	
1.3 Introduction of the market initiative	The introduction of the market initiatives gives relevant background information about the requirements in the standard and should therefore be kept. As some of the MI documents were created quite some time ago, the market initiatives are asked to help out with updating (and shortening) the introduction.
1.4 Scope and application	Keep, but rewrite
1.5 Terms and definitions	Keep
2 Requirements (In the MI105 document, the actual requirements are placed in a number of chapters, but the proposal is the same as the other MI documents)	This chapter contains the requirements from the market initiative. It is a combination of references to the relevant requirements in the GMP+ B100 standard and the specific additional requirement from the market initiatives. The requirements will be kept, but rewritten where possible & needed without changing what is required by the market initiative.

Request to the Subcommittee Responsible feed

1. Is the project objective and the outcome clear or do you prefer a videocall with us to take you through the process?
2. Can you agree with the drafts we created?
3. Can you agree with the next step; a public consultation on our website so all interested parties in the GMP+ community can provide us their input to further improve the new FRA documents.

Next steps

- After this e-mail consultation, we will finalize the documents based on the proposals.

- There is a meeting planned with the International Expert Committee and all subcommittees (including the subcommittee responsible feed) on 26 May 2020 where we aim to finalize the outcome of #ProjectGMP+2020 of which the GMP+ FRA module is part of.
- The GMP+ FRA module will thereafter follow it's own path of a public consultation during the summer. We will require your help again for discussing the results of the public consultation and finalizing the documents for publication.

NB: the dates/periods in the above overview might change due to the current international Corona-crisis. This prevents us to have physical meetings at the moment and requires creativity in consulting the branch organizations and GMP+ Community.