



# S9.37 - FRA Module FAQ

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## 1. General

### 1.1. What is GMP+ FRA certification?

FRA stands for Feed Responsibility Assurance. As part of the GMP+ Feed Certification scheme, the GMP+ FRA module contains requirements for the assurance of the production and / or trade of responsible feed. Via independent certification, the GMP+ certified company can demonstrate compliance with the requirements for producing and / or trading responsible feed.

GMP+ FRA certification is particularly interesting for companies with a GMP+ FSA (Feed Safety Assurance) certificate. The reason for this is that the system requirements for assuring responsible feed are very similar to the system requirements for assuring safe feed. This makes it very interesting to combine both certifications: a one-stop-shop multiple certification, allowing 1 auditor to include both aspects in his audit. This saves time and money. However, the certification can also be used in combination with another feed safety certification or as stand-alone.

### 1.2. What documents are part of the FRA module?

The GMP+ FRA module consists of two components:

#### 1. **GMP+ FRA Framework**

The GMP+ FRA Framework contains the system requirements for assuring responsible feed. These requirements have a lot of overlap with the GMP+ FSA standards, such as the procedures and registrations for tracking & tracing and for the selection and evaluation of suppliers.

In addition, general system requirements (management responsibility, staff matters, internal audit etc.) are also necessary for the continuous assurance of requirements for responsible feed, just as they are required for assuring feed safety requirements.

The GMP+ FRA Framework consists of the R 5.0 *Feed Responsibility Management Systems Requirements*.

#### 2. **GMP+ MI documents**

The GMP+ MI documents contain the scopes and criteria for responsible feed. These MI documents have been established in consultation with the market initiative referred to on the cover sheet and the introduction. This market party has provided the definition of responsible feed and asked GMP+ International to provide independent certification for it.

Companies who wish to be certified for a scope from one of the MI documents, always do this in combination with R 5.0. The GMP+ MI document states what parts from the R 5.0 apply.



### 1.3. How does the combined use of R 5.0 and MI document work?

All MI documents have a clear reference to the R 5.0 *Feed Responsibility Management Systems Requirements*. All mentioned parts of the R 5.0 must be implemented to ensure compliance with the requirements in the MI documents. The auditor will check compliance with both documents during the audit.

### 1.4. How can I combine a GMP+ FRA certification with a GMP+ FSA certification?

Although GMP+ FRA certification is possible without additional (feed safety) certification, most feed companies will apply GMP+ FRA certification as an addition to certification for scopes of the GMP+ Feed Safety Assurance (FSA) module.

To facilitate this multiple certification, GMP+ International has integrated certification for both feed safety assurance and feed responsibility assurance in a single certification scheme (the GMP+ Feed Certification scheme). This prevents overlap of requirements, ensures uniformity in standards and conditions and allows for limiting the (administrative) burden of audits and certifications. One (successful) audit can result in certification of multiple scopes.

However, it is the responsibility of the feed company to identify the overlap between the GMP+ FSA module and R 5.0 *Feed Responsibility Management Systems Requirements*, and to implement all relevant conditions into one management system which ensures both compliance with the feed safety standards and the requirements in the FRA module. Compliance will be verified during the audit.

### 1.5. Do I have to make a lot of adjustments to my system to be certified for the GMP+ FRA module?

Although there are a lot of requirements – in particular in the R 5.0, it is relatively easy to implement the GMP+ FRA requirements. In fact, the only thing it requires is to view your current Feed Safety Management System through different eyes. This means, for instance, that your manual must include a procedure for informing your customers about the status of the feed.

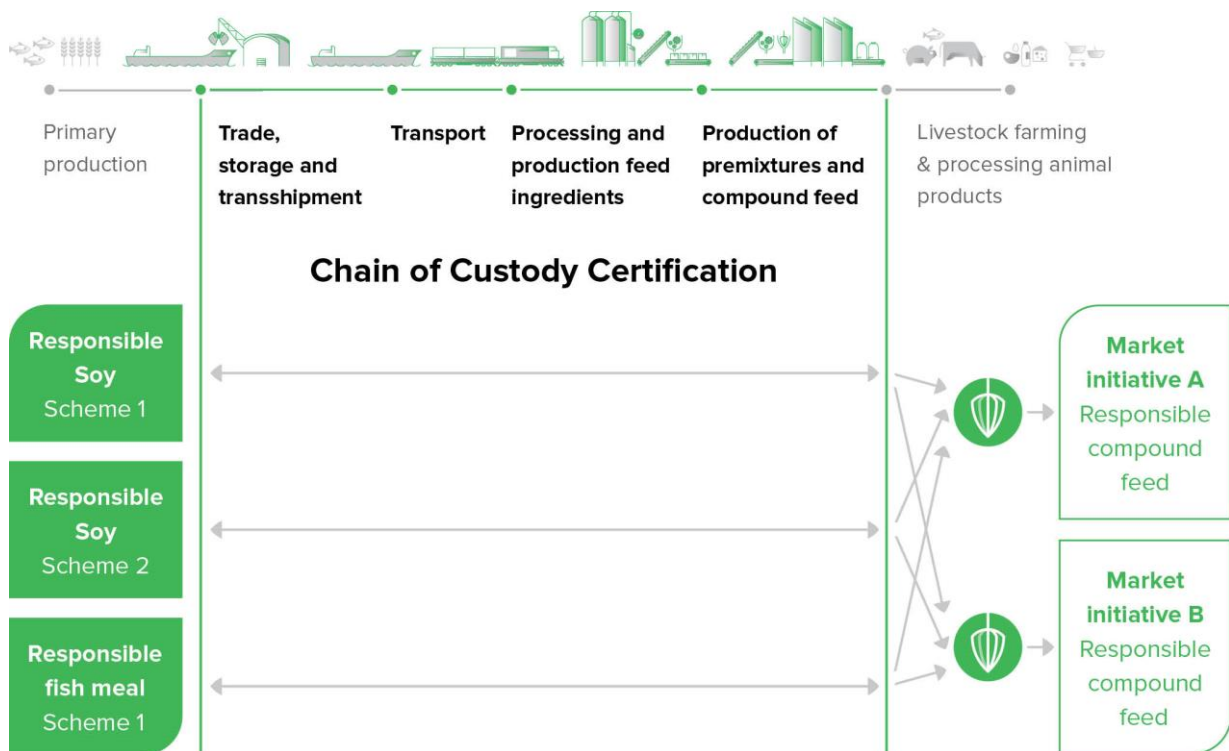
All requirements listed in chapter 4 of the R 5.0 match requirements from the GMP+ FSA standards. For that reason, Annex 1 of the document contains a cross-reference table to identify the origin of these requirements.

New in the GMP+ FRA module (in relation to the GMP+ FSA certification) is the Material Accounting System. This is an extensive version of a tracking & tracing system, in which you administratively document how much responsible feed you receive and how much you sell. This must be in balance.

## 2. MI documents

### 2.1. Which MI document applies to me?

GMP+ FRA certification is not required, but may be asked by your customer. Therefore, which MI document applies to you is largely determined by what the customer asks of you. Regardless of that, below you will find a brief overview of the various types of companies with associated (possible) MI documents. All this is in line with the following schematic representation in which a bridge is made between 'chain of custody certification' and the delivery to subsequent links:



In the 'chain of custody' (supply chain) it is unknown what an individual raw material may be used for in the end. Therefore, a certificate for sustainable cultivation is aimed at for the chain of custody. In the chain of custody, it is assured that this sustainably grown raw material passes through the chain in a correct manner.

Only at the time of delivery of a feed material or a compound feed to the farmer, the connection to a market initiative can be made. This means that the turning point is at the direct delivery to the farmer.

## 2.2. What is the role of GMP+ International in determining the requirements in the MI documents?

GMP+ International works with a plug-in model for the assurance of responsible feed. GMP+ International offers a so-called GMP+ FRA Framework, providing the basis for assuring responsible feed. This GMP+ FRA Framework consists of a Feed Responsibility Management System and certification requirements. Subsequently, various market initiatives can be plugged into this GMP+ FRA Framework.



GMP+ International helps formulate the requirements defined by the market initiative for responsible feed. The reason for this is that these requirements must be concrete enough to be applied and to be auditable by an auditor. However, the market initiative is the party that determines what responsible feed is and what is included in the MI document. The subcommittee Responsible Feed tests the MI document against a number of requirements, after which it can be included in the GMP+ FRA module.

The requirements for including a MI document in the GMP+ FRA module can be found in the ["Feed Responsibility Assurance Policy"](#).



### 3. MI 5.1 Production and Trade of RTRS Soy

#### 3.1. What is the scope of the MI 5.1 document?

The MI 5.1 document contains the requirements to produce and/or trade RTRS certified soy in the supply chain. RTRS certified soy can be produced and/or traded in accordance with the supply chain models Mass Balance and Segregation.

#### 3.2. What does RTRS consider as responsible feed?

RTRS soy does not only meet the highest environmental criteria (including a guarantee of third party-verified zero deforestation and zero conversion) but also a wide-reaching set of social and labour requirements.

RTRS certification is based on five principles:

- Legal Compliance and Good Business Practices
- Responsible Labour Conditions
- Responsible Community Relations
- Environmental Responsibility
- Good Agricultural Practices

#### 3.3. Who will ask for feed that is in compliance with MI 5.1?

Feed producers that want to purchase RTRS Segregated soy or RTRS Mass Balance soy will look for a supplier that is certified for the applicable scope. The feed producer can choose to buy from a RTRS Chain of Custody certified supplier or a (GMP+) MI 5.1 certified supplier.

#### 3.4. How does MI 5.1 relate to RTRS certification?

The certification scheme of RTRS offers two certifications:

1. RTRS Standard for Responsible Soy Production (intended for the cultivation of RTRS soy)
2. RTRS Chain of Custody Standard (for the subsequent links in the chain)

The scopes Mass Balance and Segregation within the MI 5.1 *Production and Trade of RTRS Soy* are equivalent to the scopes Mass Balance and Segregation within the RTRS Chain of Custody Standard. This is also confirmed in an agreement between RTRS and GMP+ International <sup>1</sup>.

Because of this, participants in the MI 5.1 are permitted to use the RTRS logo and to supply to RTRS participants.

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<sup>1</sup> The agreement between RTRS and GMP+ International is currently under evaluation. This means that the standard and/or the related certification requirements might be updated to maintain equivalence with the RTRS Chain of Custody standard. Any changes must be approved by the GMP+ Subcommittee Responsible Feed and International Expert Committee. We will communicate to the GMP+ Community about any changes to the GMP+ FC scheme via our newsletters. Click [here](#) to subscribe to our newsletters.





## 4. MI 5.2 Responsible Pig & Poultry feed

### 4.1. What is the scope of the MI 5.2 document?

The MI 5.2 document contains:

- the requirements to produce and/or trade responsible soy and
- the requirements to produce and/or trade responsible compound feed.

The responsible feed is intended for pigs and poultry that supply eggs, poultry meat or pork meat to the SMK food chain.

### 4.2. What does SMK consider as responsible feed?

All soy (including soy derivatives and soy products) in responsible pig & poultry feed, must be responsible soy. Responsible soy is defined by SMK as RTRS soy. For the purchase of the responsible soy SMK allows the following 3 supply chain models:

- Segregation
- Mass Balance
- Book & Claim (the purchase of RTRS credits)

### 4.3. Who will ask for feed that is in compliance with MI 5.2?

The requirements for the purchase of feed that meets the criteria of SMK are defined in the following documents within the Milieukeur certification scheme:

- Certification Scheme for animal products, criteria for Milieukeur – pigs
- Certification Scheme for animal products, criteria for Milieukeur – egg (laying hens)
- Certification Scheme for animal products, criteria for Broilers with standards for Milieukeur

Participants in the schemes above will ask for feed that meets the MI 5.2.

Of course it is possible that other livestock farmers (that keep other animals or that are not participating in the Milieukeur certification) require certification for the MI 5.2.

### 4.4. What feed can be certified via MI 5.2?

MI 5.2 is suitable for the trade and production of feed materials and compound feed. Since the requirements relate to the processing of responsible soy, the certification only relates to feed that contains responsible soy.



#### 4.5. What is the validity of RTRS credits?

The GMP+ FRA module follows the requirements from RTRS concerning the validity of the RTRS credits.

The validity of RTRS credits is 24 months. When those 24 months start depends on the used material accounting system. In case of 'continuous balancing system' the 24 months start as soon as the credits are being purchased. In case a company uses 'fixed inventory period', the 24 months start when the inventory period is closed.

#### 4.6. Is redeeming of RTRS credits part of the purchase?

Yes, where the GMP+ FRA module refers to the purchasing of RTRS credits, this includes the step 'redeeming' that is part of the RTRS purchasing process.



## 5. MI 5.3 Responsible dairy feed

### 5.1. What is the scope of the MI 5.3 document?

The MI 5.3 document contains:

- the requirements to produce and/or trade responsible soy and
- the requirements to produce and/or trade responsible compound feed.

The responsible feed is intended for dairy cattle that supply milk to the food chain.

### 5.2. What does the Sustainable Dairy Chain consider as responsible feed?

All soy (including soy derivatives and soy products) in responsible dairy feed, must be responsible soy. Responsible soy is defined by the Sustainable Dairy Chain as RTRS soy.

For the purchase of the responsible soy the Sustainable Dairy Chain allows the following 3 supply chain models:

- Segregation
- Mass Balance
- Book & Claim (the purchase of RTRS credits)

### 5.3. Who will ask for feed that is in compliance with MI 5.3?

The Sustainable Dairy Chain has advised its members to include in their purchasing requirements that dairy farmers must purchase their feed from companies that meet the MI 5.3. These dairy farmers will ask for this.

The Sustainable Dairy Chain has indicated that the demand applies to all feed to the dairy farmer (not just for the lactating cows). The dairy farmer will concretely define for which feed he demands this certification.

### 5.4. What feed can be certified via MI 5.3?

MI 5.3 is suitable for the trade and production of feed materials and compound feed. Since the requirements relate to the processing of responsible soy (including byproducts), the certification only relates to feed that contain responsible soy.



### 5.5. What is the validity of RTRS credits?

The GMP+ FRA module follows the requirements from RTRS concerning the validity of the RTRS credits.

The validity of RTRS credits is 24 months. When those 24 months start depends on the used material accounting system. In case of 'continuous balancing system' the 24 months start as soon as the credits are being purchased. In case a company uses 'fixed inventory period', the 24 months start when the inventory period is closed.

### 5.6. Is redeeming of RTRS credits part of the purchase?

Yes, where the GMP+ FRA module refers to the purchasing of RTRS credits, this includes the step 'redeeming' that is part of the RTRS purchasing process.



## 6. MI 5.4 GMO controlled

### 6.1. What is the scope of the MI 5.4 document?

The scope of the standard is defined as 'GMO controlled' and can be used for:

- The production of GMO controlled compound feed, feed materials, feed additives and premixtures
- The trade of GMO controlled compound feed and/or feed materials
- The storage and transshipment of GMO controlled compound feed and/or feed materials
- The transport of GMO controlled compound feed and/or feed materials

### 6.2. What does VLOG consider as responsible feed?

The VLOG Standard is based on the GMO labelling provisions of Regulations (EC) 1829/2003 and 1830/2003. Contamination with GMOs permitted in the EU by law does not require labelling according to Regulations (EC) No. 1829/2003 and No. 1830/2003 provided that two requirements are fulfilled:

- The threshold value of the GMO content of 0.9% per feed material is not exceeded and
- The presence of the GMO content is "adventitious or technically unavoidable".

Certification for VLOG or the (GMP+) MI 5.4 shows compliance with these regulations.

### 6.3. Who will ask for feed that is in compliance with MI 5.4?

Livestock farmers who deliver non-GMO food products (meat / milk / eggs) to the market, will ask their feed suppliers to deliver non-GMO feed. For these livestock farmers, it is required to feed their livestock with non-GMO feed in order to sell their food products such as dairy, eggs and meat as non-GMO products.

### 6.4. Does all feed needs to be covered under MI 5.4 certification?

No, only the feed of which the GMP+ certified company wants to make the claim that the feed is GMO controlled. MI 5.4 can be applied for all compound feed, feed materials, feed additives and premixtures. All feed that are included in the scope of certification, must comply to the requirements in the MI 5.4.



## 6.5. Do I need to make a Risk Assessment for other products than feed materials?

No, this requirement is only applicable for feed materials. Compound feed, feed additives and premixtures are excluded for this requirement.

In case a compound feed producer uses feed materials to produce the compound feed, the result of the risk assessment of the individual feed materials is used to manage risks for the compound feed.

As with GMP+ FSA certification, the requirements in the MI 5.4 do not apply for products other than feed. If a trader sells (for example) straw as bedding to livestock farmers, this is not covered with the certification.

## 6.6. Why does not GMP+ International or VLOG publish a list of at risk / not at risk feed materials?

It is not possible for GMP+ International to make a generic risk assessment for all feed materials that are suitable for all situations.

VLOG sets the requirement to make a risk assessment to define at risk / not at risk feed materials (that GMP+ International follows in MI 5.4), but also does not provide a list of at risk feed materials to its participants. VLOG does provide some guidance in following document:

An "Assessment Aid – At Risk Feed" is available on the VLOG homepage (under '[Further Documents / Instructions](#)') to assist the feed business. This document includes a table which provides an overview of where growing genetically modified plants is allowed and thus possible at risk feed origin.

GMP+ International advises the participant to use this document (among all available information) to create its own risk assessment.

## 6.7. Do I have to sample and test incoming compound feed, feed materials, feed additives and/or premixtures which I have classified as 'not at risk'?

No, this is not required as part of the GMP+ (and VLOG) certification.



### 6.8. Can I purchase from non-certified suppliers?

Yes, as long as the participant has a confirmation from the supplier of the GMO controlled status of the purchased feed.

### 6.9. What to do when my company currently has a VLOG certificate for GMO controlled feed?

When a company is currently certified for the VLOG standard it is possible to change to the FRA standard MI 5.4. This can be arranged with the Certification Body which provided the VLOG certificate and has got acceptance for MI 5.4 GMO controlled. Please contact your Certification Body for more information about the transition.

### 6.10. Is multisite certification possible for MI 5.4?

Yes, it is possible to get a multisite certification. The requirements are described in CR 2.0 *Assessment and Certification*. Your Certification Body can give more information about this possibility.

### 6.11. Feed materials in which GMOs cannot be tested through a PCR test may not be purchased from non-certified suppliers and sold as GMO controlled. When is it not possible to detect GMOs in feed materials with a PCR test?

It is not possible to detect GMOs in a feed material with a PCR test if:

1. the feed material has a lack of sufficient DNA (genetic material). According to the VLOG document "Suitability of Testing for GMOs in Raw Materials, Feed-and Food Ingredients" this is the case for feed materials which are strongly processed, like soy bean oil, rape seed oil and glycerin.
2. the feed material does not have sufficient detectable DNA anymore. This concerns feed materials, which in principle can be tested with a PCR test, but due to process steps, show fluctuations in the DNA amount. According to the VLOG document "Suitability of Testing for GMOs in Raw Materials, Feed-and Food Ingredients" this concerns for example soy lecithin, sugar beet (pressed) pulp.

The VLOG document "Suitability of Testing for GMOs in Raw Materials, Feed-and Food Ingredients" is available on the [VLOG-startpagina](#) (under 'Further Documents / Instructions').



### 6.12. According to MI 5.4 I have to inform my customer about the status of the feed. Can I use the terms 'GMO free' or non-GMO'?

No, the claims 'GMO free' and 'non-GMO' suggest the absence of GMOs. It is technically impossible to say that there is no GMO present in a sample. Therefore the term 'GMO controlled' declares that the feed is produced, traded, stored or transported in compliance with the requirements of the MI 5.4.

### 6.13. As a GMP+ certified company I want to label my products with the VLOG geprüft seal. Am I allowed to do this?

Yes, you are allowed. More information on the use of the VLOG geprüft seal can be found via the VLOG website:

<https://www.ohnegentechnik.org/vlog-geprueft-siegel/beantragung-des-siegels/>

### 6.14. Is it allowed to use the statement 'GMO controlled' in Belgium?

We've received questions whether is allowed to use the statement 'GMO controlled' in Belgium (because it is thought to be conflicting with legislation). The following confirmation from the Belgium authority FAVV shows that there is no legal objection to use the GMO controlled statement in Belgium:

*"I have contacted our local control authorities and according to the information in my possession, I have not received any feedback confirming that inspectors are of the opinion that GMP+ certified feed companies in Belgium cannot use the declaration "GMO Controlled".*

*The FAVV controls claims on animal feed in accordance with article 13 of Regulation (EC) No 767/2009. In the context of GMP+ standard MI 5.4 GMO Controlled, the "GMO controlled" claim is objective and verifiable.*

*We have forwarded this information to our local control authorities. "*





## Appendix: Cross-reference

Cross-reference between the System Requirements of R 5.0 *Feed Responsibility Management Systems Requirements* and the relevant GMP+ FSA standards.

R 5.0 <i>Feed Responsibility Management Systems Requirements</i>	R 1.0			TS document
<b>4.1 Feed Responsibility Management System</b>				
4.1.1 Leadership and commitment	5.1			
4.1.2 Top management's responsibilities and authorities	5.3.1			
4.1.3 Determining the scope of the Feed Responsibility Management System	4.3			
4.1.4 Documented information	7.5.1	7.5.2	7.5.3	
<b>4.2 Prerequisite programmes (PRPs)</b>				
4.2.1 People	7.1.2	7.2	7.3	
4.2.2 Traceability system	8.3			TS 1.1, § 10
<b>4.3 Risk Assessment</b>	8.5.2.2			
<b>4.4 Purchase</b>				
4.4.1 Selection of suppliers	7.1.5			
4.4.2 Verification of incoming products and/or services				TS 1.1, § 9.1
<b>4.5 Informing the customer</b>				
4.5.1 Inform the customer about the status of the feed	7.4.2			
4.5.2 Delivery requirements	7.4.2			
<b>4.6 Verification</b>				
4.6.1 External communication	7.4.2			
4.6.2 Internal audit	9.2			
4.6.3 Management review	9.3.1	9.3.2		

At GMP+ International, we believe everybody, no matter who they are or where they live, should have access to safe food.

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