



FAQ GMP+ FRA certification

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GMP+ Feed Certification scheme



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1. General

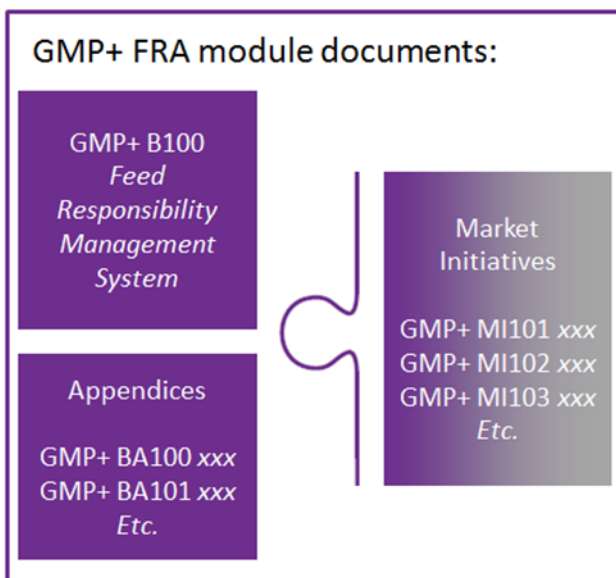
1.1. What is GMP+ FRA certification

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 participant 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 food safety requirements.

The GMP+ FRA Framework currently consists of 1 document: the GMP+ B100 *Feed Responsibility Management System*. GMP+ BA Appendices may be added to the GMP+ FRA Framework in the future.

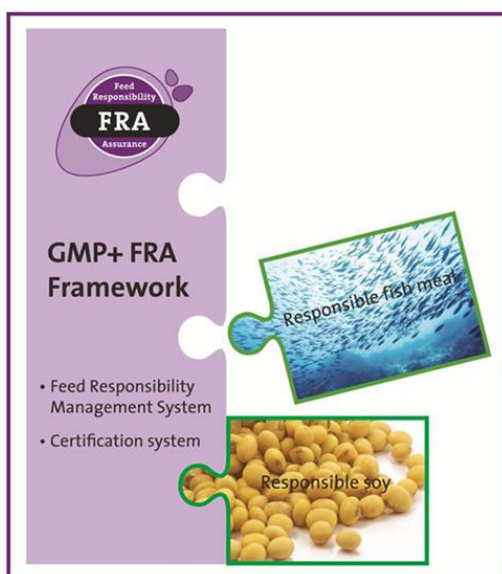
2. GMP+ MI documents

The GMP+ MI documents contain the scopes and criteria for responsible feed. These GMP+ 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 GMP+ B100. The GMP+ MI document states what parts from the GMP+ B100 apply.

1.3. What is the role of GMP+ International in determining the requirements in the GMP+ 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 GMP+ MI document against a number of requirements, after which it can be included in the GMP+ FRA module. The requirements for including a GMP+ MI document in the GMP+ FRA module can be found in the [feed responsibility assurance policy](#).

1.4. 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 GMP+ B100, 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 GMP+ B100 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 soy you receive and how much you sell. This must be in balance.

2. GMP+ MI documents

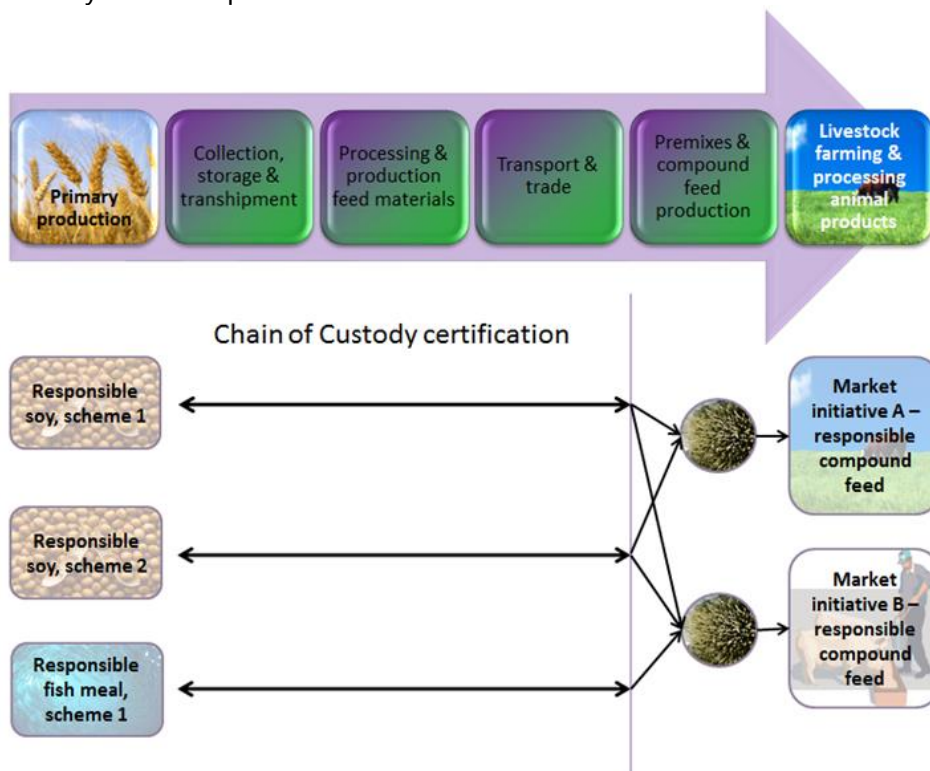
2.1. What is responsible feed understood to mean in the current GMP+ MI documents?

Currently, responsible feed (in GMP+ MI102 and GMP+ MI103) is defined as feed in which responsible soy is processed. Here, responsible soy is defined as RTRS or equivalent. What other responsible soy certificates are considered to be equivalent, has not yet been determined by the market initiatives. Therefore, until then, only RTRS soy is included as purchase option for companies.

It is likely that, in the future, other soy certificates will be approved as well, and other raw materials will be included. But that depends on the wishes of the various market initiatives.

2.2. What GMP+ MI document applies to me?

GMP+ FRA certification is not required, but may be asked by your customer. Therefore, which GMP+ 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) GMP+ 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 dairy farmer.

Production / trade feed material – delivery within the chain of custody

Since, in the delivery of feed materials within the chain of custody, it is not yet known to what market party the delivery will be made, it is only possible to be certified for a chain of custody. Within the GMP+ FRA module, it is currently possible to receive additional certification for the GMP+ MI101 *Production and trade of RTRS soy*. This allows the participant to demonstrate (via the scopes RTRS Mass Balance or RTRS Segregation), RTRS that soy is correctly inserted into the chain of custody

It is up to the participant to determine whether certification is entered into via the GMP+ MI101 or whether an RTRS Chain of Custody certificate is opted for. Both certifications are equivalent and are approved by subsequent links.

In the aforementioned situation, physical flows of RTRS soy available on the market have been assumed. It is expected that (in particular in the startup phase) RTRS certified soy will hardly or not be available on the market, and book & claim credits will be used. In that case, the compound feed company (or even links further along in the chain) can purchase RTRS credits, combined with regular soy. Whether it is necessary to certified for the GMP+ MI101 depends on the demand of your customers.

Production / trade feed material – delivery direct to dairy farmer

When the feed materials are delivered directly to the dairy farmer, the dairy farmer (who participates in one of the marketing initiatives housed within the GMP+ FRA module) will ask for an appropriate certification.

In case of delivery to participants to 'Milieukeur – animal products' the dairy farmer will ask for feed that meets the GMP+ MI102 *Responsible pig & poultry feed*.

Dairy farmers who participate in the Sustainable Dairy Chain via their dairy cooperative, will ask for feed that meets the GMP+ MI103 *Responsible dairy feed*.

Production / trade compound feed – delivery to dairy farmer (whether or not brokered)

In the production or trade of compound feed that is delivered directly to the dairy farmer, the dairy farmer (who participates in one of the marketing initiatives housed within the GMP+ FRA module) will ask for an appropriate certification.

In case of delivery to participants in 'Milieukeur – animal products' the farmer will ask for feed that meets the GMP+ MI102 *Responsible pig & poultry feed*.

Dairy farmers who participate in the Sustainable Dairy Chain via their dairy cooperative, will ask for feed that meets the GMP+ MI103 *Responsible dairy feed*.

Storage as service

At this point, storage sites do not have to be certified for the storage of responsible feed. It may be however, that the principal has its own requirements for the storage of responsible feed.

Transport

At this point, no additional certification is required for the transport of responsible feed. It may be however, that the principal has its own requirements for the storage of responsible feed.

2.3. [The current GMP+ MI102 and GMP+ MI103 documents have been drawn up by Dutch market initiatives. Can companies in countries outside of the Netherlands still participate?](#)

Although the market initiatives GMP+MI102 and GMP+ MI103 are active in the Netherlands, it is definitely possible to be certified for the scopes in the GMP+ MI documents outside of the Netherlands. This is particularly interesting for companies that deliver to participants of the market initiatives, such as near the border of the Netherlands. But also without concrete market demand, it is possible to be certified for the GMP+ MI scopes.

2.4. [How do the GMP+ MI documents relate to the Nevedi covenant?](#)

Within Nevedi, a covenant was signed in September 2014. This covenant states that soy for which there is no specific market demand with a sustainability requirement, is still purchased with a certain sustainability level. Within this covenant, RTRS is also approved for the purchase of sustainable soy. In addition, other sustainable soy certificates will be approved within the covenant. More information about this is available on the [website of Nevedi](#).

Although, within the Nevedi covenant, more sustainable soy certificates are approved than RTRS, this does not apply to the market initiatives GMP+ MI102 and GMP+ MI103 (at this point). This means that, for the delivery of feed that must meet the GMP+ MI102 and / or GMP+ MI103, this feed must also have been processed in accordance with the requirements of the relevant GMP+ MI documents.

For all deliveries outside of these market initiatives, the participant can also accept other sustainable soy certificates than just RTRS.

Please note: since the requirements of this Nevedi covenant are not documented in a GMP+ MI document, these requirements will not be audited during the audit for the GMP+ FRA module.

3. GMP+ MI101 Production and Trade of RTRS soy

3.1. How does GMP+ MI101 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 GMP+ MI101 *Production and trade of RTRS soy* are equivalent to the scopes Mass Balance and Segregation within the RTRS Chain of Custody Standard. This was also confirmed in an agreement between RTRS and GMP+ International. Because of this, participants in the GMP+ MI101 are permitted to use the RTRS logo and to supply to RTRS participants.

Companies can choose – for the delivery of RTRS soy – to have themselves certified for the RTRS Chain of Custody Standard or for the GMP+ MI101 *Production and trade of RTRS soy*. The benefit of the certification accordance with the GMP+ MI101 is that it can be included in the regular GMP+ audit. Because of this, the audit burden for companies remains limited. But of course, the RTRS Chain of Custody Standard is also approved for delivering soy within the GMP+ FRA module.

More information about the partnership between RTRS and GMP+ International is available in the introduction of the GMP+ MI101 *Production and trade of RTRS soy* and on the website of [RTRS](#).

4. GMP+ MI102 Responsible pig & poultry feed

4.1. Who will ask for feed that meets GMP+ MI102?

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 GMP+ MI102.

4.2. What feed can be certified via GMP+ MI102?

GMP+ MI102 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. Milieukeur has not specified for which feed the certification is required (such as piglets, sows, pigs ready for slaughtering, etc). Based on this, it may be concluded that all feed for all stages of pigs fall under the requirements. The Milieukeur participant will concretely define for which feed he demands the certification.

5. GMP+ MI103 Responsible dairy feed

5.1. Who will ask for feed that meets GMP+ MI103?

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 GMP+ MI103. These dairy farmers will ask for this.

5.2. What feed can be certified via GMP+ MI103?

The GMP+ MI103 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.

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

5.3. Feed suppliers must be certified as of 1-1-2015. Is that even possible?

GMP+ International has informed the Sustainable Dairy Chain of the fact that it is possible to be granted certification for the GMP+ MI 103 *Responsible dairy feed* as of 1-1-2015. Since, in practice, it is not feasible to have participants certified on 1-1-2015, it was agreed that participants who commit to certification in 2015, will be placed on a list. Only feed suppliers included on this list, will be allowed to supply dairy farmers who participate in the initiative of the Sustainable Dairy Chain. The list will be published on the [website of GMP+ International](#) so that, during 2015, insight will be obtained in which companies have applied for certification.

5.4. Do soy hulls also fall under the scope?

A lot of soy hulls are processed in dairy feed. Since it is fairly expensive to purchase RTRS credits in relation to the value of soy hulls, the possibility of not including soy hulls in the scope of the GMP+ MI103 was discussed. Regardless of the consequence for the price, it was decided that soy hulls do fall under the scope and must be purchased responsibly (via RTRS credits or other supply chain models). Of course, this can be revised by the Sustainable Dairy Chain when necessary.

6. GMP+ MI105 GMO Controlled

6.1. Who will ask for feed that meets GMP+ MI105?

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.

6.2. What is the scope of the standard?

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

6.3. Does all feed needs to be covered under GMP+ MI105 certification?

No, only the feed of which the GMP+ certified company wants to make the claim that the feed is GMO Controlled. GMP+ MI105 certification 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 GMP+ MI105 standard.

6.4. 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 MI105 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.

6.5. 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 this MI105 document), 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.

6.6. Can I purchase from non-certified suppliers?

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

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. 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 GMP+ MI105. This can be arranged with the Certification Body which provided the VLOG certificate and has got acceptance for GMP+ MI05 GMO Controlled. Please contact your Certification Body for more information about the transition.

6.9. Is multisite certification possible for GMP+ MI 105?

Yes, it is possible to get a multisite certification. The requirements are described in the GMP+ C6 document. Your Certification Body can give more information about this possibility.

6.10. 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').

6.11. According to GMP+ MI105 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 GMP+ MI105 standard.

6.12. 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/>

7. Annex 1: Cross-reference

Cross-reference between the System Requirements of GMP+ B100 and the GMP+ FSA standards.

GMP+ B100	B1	B2	B3
4.1 Management system			
4.1.1 Management responsibility	5.1	4.1	4.1
4.1.2 Management representative	5.4	4.2	4.2
4.1.3 Requirmeents for the management system	4.1	4.3	4.3
4.1.4 Documentation and registration	4.2	4.4	4.4
4.2 Prerequisite programme			
4.2.1 Personnel	6.2	5.1	5.1
4.2.2 Identification and traceability	6.5	5.4	5.4
4.3 Risk assessment	7	6	6
4.4 Purchasing requirements			
4.4.1 Selection of suppliers	7.10	7.1	7.1.3
4.4.2 Verification of incoming products	7.10.3	7.2	7.1.4
4.4.3 Services	7.10	7.1	7.1.2
4.5 Informing the customer & delivering requirements			
4.5.1 Inform the customer about the status of the feed	7.11.3	7.6	7.1.7
4.5.2 Delivery requirements	7.11.3	7.6	7.1.7
4.6 Verification and improvement			
4.6.1 Complaints	7.2.4	8.1	8.1
4.6.2 Internal audit	8.2	8.2	8.2
4.6.3 Assessment of the management system and improvements	8.3	8.3	8.3

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