



NON-GM/“OHNE GENTECHNIK” ADD-ON

Module 3: Processing Facility for Livestock/Aquaculture

CONTROL POINTS AND COMPLIANCE CRITERIA

ENGLISH VERSION 1.1

Valid from: 1 January 2020



INTRODUCTION

SCOPE DEFINITION OF THE ADD-ON MODULE

THE SCOPE OF THIS GLOBALG.A.P. ADD-ON MODULE IS THE DEFINITION OF THOSE ADDITIONAL CONTROL POINTS AND COMPLIANCE CRITERIA FOR THE INSPECTION OF A LIVESTOCK / AQUACULTURE PROCESSING FACILITY THAT INTENDS TO PROCESS AND TO SUPPLY LIVESTOCK / AQUACULTURE PRODUCTS TO BE LABELED NON GM / "OHNE GENTECHNIK".

THE APPLICABILITY OF THIS ADD-ON IS LIMITED TO

1. LIVESTOCK / AQUACULTURE PROCESSING FACILITIES LOCATED AND OPERATING IN EU MEMBER STATES WHERE THE EU REGULATIONS NO. 1829/2003 AND NO. 1830/2003 ARE MANDATORY AND IN FORCE AND TO
2. LIVESTOCK / AQUACULTURE PROCESSING FACILITIES LOCATED AND OPERATING IN COUNTRIES WHERE LOCAL LEGISLATION IS EQUIVALENT TO THESE EU REGULATIONS.

AS A PREREQUISITE THE SAID PROCESSING UNIT SHALL HAVE THE GLOBALG.A.P. INTEGRATED FARM ASSURANCE CERTIFICATION FOR THE CHAIN OF CUSTODY APPLICABLE FOR THE SCOPES OF LIVESTOCK / FISH FROM AQUACULTURE.

THE ADD-ON IS VOLUNTARY.

IN CASE OF PASSING THE AUDIT, A LETTER OF CONFORMANCE SHALL BE ISSUED BY THE CERTIFICATION BODY.



DEFINITIONS:

FOOD PROCESSING

Food Processing comprises a significant change in structure, in appearance or in form of the original food, e.g. through cutting, heating, smoking, curing, aging, desiccating, marinating, extracting, extruding, packaging or a combination of these various processes.

For Aquaculture product processing is defined by any post harvest handling.

For Livestock product processing includes the slaughter.

NON GM/“Ohne Gentechnik” FOOD

The definition is based on the Regulations (EC) No. 1829/2003 and No. 1830/2003. Feed and food ingredients that are subject to compulsory labeling under these Regulations are not fit for the production Non-GM Food.

GMOs shall not be used in the production of NON-GM food. Food, Ingredients and additives shall not contain or shall not be produced from GMOs. In general, adventitious or technically unavoidable traces of genetically modified material are tolerated up to a threshold of at most 0.1% per ingredient. Processing aids may not be produced by GMOs.

For the production/processing of NON-GM food, no processing aids or other substances shall be used which contain, consist of or are produced from GMOs labeled in accordance with Regulation (EC) 1829/2003 or 1830/2003, or which would have to be labeled accordingly when they placed into circulation.



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Nº	Control Points	Compliance Criteria	Level
NON-GM PRCSR	PROCESSING OF NON-GM / “OHNE GENTECKNIK” LIVESTOCK / FISH FROM AQUACULTURE		
	<i>Control points in this module are applicable to all processors of livestock / fish from aquaculture seeking certification according to the Non-GM Add-on PRODUCTION OF NON GM / “OHNE GENTECHNIK” FISH / LIVESTOCK located and operating in EU Member States where the EU REGULATIONS NO. 1829/2003 and NO. 1830/2003 are mandatory and in force or located and operating in countries where local legislation is equivalent to these EU REGULATIONS or located in countries where the commercial cultivation and import of GMOs is prohibited by law.</i>		
NON-GM PRCSR 1	PROCESSING FACILITY DESCRIPTION		
NON-GM PRCSR 1.1	Is a specific description of the processing facility available that describes the processing of the aquaculture / livestock products and does it integrate the possible intake points of GM products?	<p>A specific description of the processing facility shall be available that describes in detail the processing of aquaculture / livestock products. It shall include the following</p> <ul style="list-style-type: none"> • All locations, production sites and production lines including outsourced production processes, if applicable. • Specifications of all “NO- GM/Ohne Gentechnik” products that are produced in the facility. • List of suppliers. • Organisational chart of personnel with names and responsibilities. • Overview of the subcontractors / contract processors involved in the “NON-GM/Ohne Gentechnik” process. These must be involved in the process on the basis of a written specification and contract or agreement. • Compilation of “NON-GM/Ohne Gentechnik” formulations. (Formulations / formulation changes must be approved by a manager in the facility). • Definition of possible intake points of GM products. 	Major Must

N°	Control Points	Compliance Criteria	Level
NON-GM PRCSR 1.2”	Is there an updated organisational chart of all persons working in the processing facility available and does it determine who is the responsible person for the processing regarding the “NON-GM/Ohne Gentechnik” products and a deputy plan to cover for absence?	An organisational chart of all persons working in the processing facility shall be present that determines who is the responsible person for the processes with regards the processing of “NON-GM/Ohne Gentechnik” products and a deputy plan to cover for absence.	Major Must
NON-GM PRCSR 2	RISK ANALYSIS / SELF MONITORING SYSTEM		
NON-GM PRCSR 2.1	Do the risk analysis and the self-monitoring system for the processing of products of animal origin include all the requirements of “NON-GM/Ohne Gentechnik” of the country of production and the country of destination?	<p>The risk analysis and the self-monitoring system for the processing of products of animal origin shall include the requirements of “NON-GM/Ohne Gentechnik” of the country of production and of the country of destination. These shall be at minimum the following ones:</p> <ul style="list-style-type: none"> a) a segregation when handling GM-containing and GM-free products as well as any possibilities of introduction and cross-contamination with GMOs especially any additives that are in use. b) a HACCP based risk assessment concerning the correctness of the “NON-GM/Ohne Gentechnik” claim. c) a risk assessment evaluating the possibility regarding the use of aromas, enzymes, cultures of microorganisms, additives, auxiliary substances and other food ingredients on the basis of certificates presented by the suppliers. d) a risk-assessed sampling regime as far as GMOs are detectable in the product. This applies primarily to raw materials of plant origin. e) analyses shall be performed by laboratories accredited according to DIN EN ISO / IEC 17025 and shall follow the methodological and analytical procedures as outlined in Annexes 2 and 3 of Module 1. 	Major Must

Nº	Control Points	Compliance Criteria	Level
NON-GM PRCSR 2.2	Does the processing facility take responsibility to conduct a minimum of one internal self-assessment per year against the GLOBALG.A.P. NON-GM Add-on Standard Module 3 for processing facilities?	<p>There is documented evidence that one internal self-assessment per year has been completed under the responsibility of the processing facility against the GLOBALG.A.P. NON-GM Add-on Standard Module 3 for processing facilities.</p> <p>The self-assessments shall include all applicable control points, even when a subcontracted company carries them out.</p> <p>The self-assessment checklist shall contain comments of the evidence observed for all non-applicable and non-compliant control points.</p> <p>This shall be done before the CB inspection (See General Rules for the NON-GM Add-on Standard).</p>	Major Must
NON-GM PRCSR 3	TRAINING OF STAFF FOR “NON-GM” / “OHNE GENTECHNIK” PROCESSING OF FISH / LIVESTOCK		
NON-GM PRCSR 3.1	Is there an annual training of all staff members involved in the processing procedures of fish/livestock on the requirements for products to be labeled “NON-GM/Ohne Gentechnik”?	There shall be an annual training of all staff members involved in the relevant processing procedures of products to be labeled according to the “NON-GM/Ohne Gentechnik” requirements. The training shall include the truck drivers that handle bulk materials or non-tamper-resistant packed goods.	Major Must
NON-GM PRCSR 3.2	Is there a documentation of the annual training according to CP 3.1 on the Non-GM / “Ohne Gentechnik” standard requirements detailing the training date, the training location, the instructor, the content and the attendees?	The annual training on the Non-GM / “Ohne Gentechnik” standard requirements shall be documented regarding the training date, the location, the instructor, the content and the attendees.	Major Must

Nº	Control Points	Compliance Criteria	Level
NON-GM PRCSR 3.3	Is there a documented initial training of all new staff members involved in the relevant processing procedures of fish/livestock on the requirements for products to be labeled “NON-GM/Ohne Gentechnik”?	The initial training of all new staff members involved in the relevant processing procedures of products to be labeled according to the “NON-GM/Ohne Gentechnik“ requirements shall be documented regarding training date, location, instructor, content and attendees. The training shall include the truck drivers that handle bulk materials or non-tamper-resistant packed goods. The training shall take place before the new staff members are intergrated in the processing procedures.	Major Must
NON-GM PRCSR 4	TRACEABILITY AND SEGREGATION		
NON-GM PRCSR 4.1	Is a traceability system incorporated that allows at any time and instantly the identification of all products that are connected to the “NON-GM/Ohne Gentechnik” labeling process on the processing facility?	A traceability system shall be incorporated that allows at any time and instantly the identification of all products that are connected to the “NON-GM/Ohne Gentechnik” labeling process on the processing facility.	Major Must
NON-GM PRCSR 4.2	Is a traceability system incorporated that allows at any time and within one working day the identification and the traceability of all products that are connected to the “NON-GM/Ohne Gentechnik” labeling process after dispatch from the processing facility?	There shall be a traceability system incorporated that allows at any time and within one working day the identification and the traceability of all products that are connected to the “NON-GM/Ohne Gentechnik” labeling process after dispatch from the processing facility?	Major Must
NON-GM PRCSR 4.3	Is a segregation system incorporated on the processing facility that safeguards at any time that products described as “NON-GM/Ohne Gentechnik” are segregated from products that do not qualify for such labeling?	A segregation system shall be incorporated on the processing facility that safeguards at any time that products described as “NON-GM/Ohne Gentechnik” are segregated from products that do not qualify for such labeling. N/A where NON-GM products are operated exclusively.	Major Must

Nº	Control Points	Compliance Criteria	Level
NON-GM PRCSR 5	CORRECT LABELING OF NON-GM FOOD PRODUCTS		
NON-GM PRCSR 5.1	Is it ensured that only goods that meet the requirements of the definition of NON-GM food shall be labeled as “NON-GM/Ohne Gentechnik” food on all labels, production and goods shipping documents?	It shall be ensured that only goods that meet the requirements of the definition of NON-GM food shall be labeled as “NON-GM/Ohne Gentechnik” food on all labels, production and goods shipping documents. In case that for systemic reasons no delivery slips/shipping documents are prepared (e.g. milk collection), there must be a clear contractual provision regarding delivery.	Major Must
NON-GM PRCSR 6	INCOMING GOODS CONTROL		
NON-GM PRCSR 6.1	Can it be demonstrated by the incoming goods department that all raw materials, food additives and auxiliary substances that are used for the production / processing / trading of products destined for labeling according to “NON-GM/Ohne Gentechnik” do meet these requirements?	The incoming goods department shall be able to demonstrate that all raw materials, food additives and auxiliary substances that are used for the production / processing / trading of products of products destined for labeling according to “NON-GM/Ohne Gentechnik” do meet these requirements.	Major Must
NON-GM PRCSR 6.2	Is there a risk based, analytical schedule in place that ensures the compliance of all raw materials of plant origin with CPCC NON-GM PRCSR 6.1?	There shall be a risk based, analytical schedule of all raw materials of plant origin in place that ensures the compliance with CPCC NON-GM PRCSR 6.1 and shall implement a scheduled as outlined in Annex 1. N/A if no preparation and processing of plant based raw materials.	Major Must

Nº	Control Points	Compliance Criteria	Level
NON-GM PRCSR 7	PRODUCER AND SUPPLIER CONFIRMATION		
NON-GM PRCSR 7.1	Is there a confirmation from the preceding supplier to the processing facility attesting that the currently delivered livestock/aquaculture products do meet the “NON-GM/Ohne Gentechnik” requirements and are certified according to this GLOBALG.A.P. Add-On Standard?	A confirmation shall be obtained from the previous supplier to the processing facility attesting that the currently delivered livestock/aquaculture products do meet the “NON-GM/Ohne Gentechnik” requirements and are certified according to this GLOBALG.A.P. Add-On Standard.	Major Must
NON-GM PRCSR 7.2	Do the processing documents confirm by declarations of the suppliers that the used ingredients, additives and auxiliary substances are not GMOs themselves, are not composed of GMOs and were neither produced from or by GMOs?	The processing documents shall confirm by declarations of the suppliers of ingredients, additives and auxiliary substances in use that these are not GMOs themselves, are not composed of GMOs and were neither produced from or by GMOs. Adventitious or technically unavoidable traces of genetically modified material shall be tolerated up to a threshold of maximum 0,1 % per ingredient.	Major Must
NON-GM PRCSR 7.3	In the case of use of aromas, enzymes, cultures of micro-organisms, additives or auxiliary substances, does the processing facility verify once a year in an adequate manner whether there are any long-term supplier confirmations and whether these confirmations are still valid in the issued form and whether the specifications are unmodified for the item in question?	In the case of use of aromas, enzymes, cultures of micro-organisms, additives or auxiliary substances, the processing facility shall verify once a year in an adequate manner whether there are any long-term supplier confirmations and whether these confirmations are still valid in the issued form and whether the specifications are unmodified for the item in question.	Major Must
NON-GM PRCSR 8	SEGREGATION AT STORAGE AND TRANSPORT		
NON-GM PRCSR 8.1	Are the storage and the transport of products that are NON-GM, GM-containing products or not NON-GM free certified products segregated and is this documented with a separate proof of adequate physical, temporal or logistical measures?	The storage and the transport of products that are either NON-GM or GM-containing products or other not NON-GM certified products shall be segregated. The individual and risk-assessed procedural steps shall be documented with a separate proof of adequate physical, temporal or logistical measures.	Major Must

ANNEX 1: FREQUENCY OF SAMPLING AND TESTING FOR RAW MATERIALS OF PLANT BASED ORIGIN

Risk category \ Area	Annual minimum number of samplings/tests for plant-based raw materials for “NON-GM Ohne Gentechnik” labelling
low	2 x per year
middle	6 x per year
high	12 x per year

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