



GMP+ D 2.5

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**GMP+ Feed Certification scheme** 

### INDEX

1	INTRODUCTION	3
1.1	GENERAL	3
1.2	STRUCTURE OF THE GMP+ FEED CERTIFICATION SCHEME	3
2	INTRODUCTION	5
3	TERMS	6
4	BACKGROUND TO THE SUPPLIER ASSESSMENTS	7
4.1	HISTORY	7
4.2	THE SUPPLIER ASSESSMENT IN THE GMP+CERTIFICATION SCHEME	8
4.3	ELEMENTS AND KEYWORDS	9
5	THE SUPPLIER ASSESSMENT	11
5.1	BASIC PRINCIPLES	11
5. 5.	THE SUPPLIER ASSESSMENT STEP FOR STEP 2.1 Exchange of information 2.2 The initial supplier assessment 2.3 The periodic reassessment 2.4 Visit to the supplier	11 11 12 13 14
APPE	NDIX 1: THE FEED SAFETY SHEET	15
EXPL	ANATORY NOTE TO THE FEED SAFETY SHEET	19

#### 1 INTRODUCTION

#### 1.1 General

The GMP+ Feed Certification scheme was initiated and developed in 1992 by the Dutch feed industry in response to various more or less serious incidents involving contamination in feed materials. Although it started as a national scheme, it has developed to become an international scheme that is managed by GMP+ International in collaboration with various international stakeholders.

Even though the GMP+ Feed Certification scheme originated from a feed safety perspective, in 2013 the first feed responsibility standard has been published. For this purpose, two modules are created: GMP+ Feed Safety Assurance (focussed on feed safety) and GMP+ Feed Responsibility Assurance (focussed on responsible feed).

<u>GMP+ Feed Safety Assurance</u> is a complete module for the assurance of feed safety in all the links of the feed chain. Demonstrable assurance of feed safety is a 'license to sell' in many countries and markets and participation in the GMP+ FSA module can facilitate this excellently. Based on needs in practice, multiple components have been integrated into the GMP+ FSA module, such as requirements for the quality management system (ISO 9001), HACCP, product standards, traceability, monitoring, prerequisites programmes, chain approach and the Early Warning System.

With the development of the <u>GMP+ Feed Responsibility Assurance module</u>, GMP+ International is responding to requests by GMP+ participants. The animal feed sector is confronted with requests on working responsibly. This includes, for example, the use of soy (including soy derivatives and soy products) and fishmeal which are produced and traded with respect for humans, animals and the environment. In order to demonstrate responsible production and trade, a company can get certified for the GMP+ Feed Responsibility Assurance.

Together with the GMP+ partners, GMP+ International transparently sets clear requirements to guarantee feed safety & responsibility. Certification bodies are able to carry out GMP+ certification independently.

GMP+ International supports the GMP+ participants with useful and practical information by way of a number of guidance documents, databases, newsletters, Q&A lists and seminars.

#### 1.2 Structure of the GMP+ Feed Certification scheme

The documents within the GMP+ Feed Certification scheme are subdivided into a number of series. The next page shows a schematic representation of the content of the GMP+ Feed Certification scheme:



All these documents are available through the website of GMP+ International (www.gmpplus.org).

The document in the present case is referred to as GMP+ D2.5 A guide for the supplier assessment.

This document was previously published as a standard document under the GMP+ certification scheme 2006. The choice of words and the tone may be compulsory, but the document should be read as a guideline.

#### 2 Introduction

The selection, assessment, approval and evaluation of the suppliers of raw materials and auxiliary substances and services (referred to hereafter as 'supplier assessment') is an important part of quality assurance of feed safety in the feed chain. This supplier assessment must be carried in such a way that a company can answer the question "Do I know what I am getting and am I running any risks?".

In practice there appear to be differences in the way in which the supplier assessment is carried out. In the period 2006-2007, there has been intensive discussion of the question of whether more uniform requirements (meaning more detailed requirements) are necessary within the GMP+FC scheme to ensure that all customers carry out the supplier assessment at the same level. It was finally decided that the current requirements are satisfactory and that further details are not necessary.

In order to ensure that the knowledge and experience acquired during the discussions was not lost, decided is to produce a guide with items for attention and background information with which a customer can set up a good system for supplier assessment or with which he can improve an existing assessment method.

This guide must be seen as a tool for carrying out the supplier assessment within the framework of the GMP+ FC scheme. There are also references in various places to GMP+ requirements. This guide has no normative status under the GMP+ FC scheme. This guide can of course be an aid in the carrying out of the supplier assessment to companies which participate in another certification scheme.

First some background information is provided about the supplier assessment and the basic principles are explained which apply to the supplier assessment under the GMP+ FC scheme. The steps are then covered which are normally taken when carrying out a supplier assessment .

### 3 Terms

A number of terms and concepts are used in this guide. The following table shows a description for these with a special meaning with respect to the GMP+ FC scheme.

Term	Description	Explanation with respect to the GMP+ FC scheme
Customer	The company which purchases products or services from the supplier.	The customer is GMP+- certified. He carries out the supplier assessment in ac- cordance with the established requirements.
Supplier	The company which delivers products or services to the customer.	A prerequisite in the GMP+ FC scheme is that the supplier of feeds is also GMP+ certified.
GMP+ certified	Certified according to the GMP+ FC scheme or according to an- other scheme which is accepted under the GMP+ FC scheme	
Supplier assessment	The whole process of selection, assessment, acceptance and periodic evaluation of the supplier, including any supply chain(s) by the customer.	
Products	All substances intended for use as, or to be processed in, feed for animals.	Within the scope of this definition are included feeds and also, for example, veterinary medical products and processing aids.
Feeds	All substances and products including additives which are processed, partially processed or unprocessed which are intended for use in the oral feeding of animals.	This includes feed materials, premixes, feed additives, semi-manufactured products, compound feeds or products which may be designated as such following a processing operation.
First-party audit	An audit of the company by the company itself ('internal audit').	
Second-party audit	An audit of a supplier by or on behalf of a customer ('supplier assessment')	
Third-party audit	An audit which is carried out by an independent (third) party such as a certification audit which is carried out by a certification body.	

### 4 Background to the supplier assessments

#### 4.1 History

Supplier assessments, which are also called second-party audits, are often used in the food sector. The development of second-party (supplier) audits was stimulated by the coming into effect of the EU regulations with respect to product liability in 1985 (Directive 85/374/EC).

During the 1990s this resulted in legislation which, in the event of damage or injury which was the fault of a product, meant that the burden of proof of innocence lay with the producer. Although this legislation goes further than just nutritional products, it still has a great influence on the way in which the retail trade approaches its policy in the field of food safety.

At the European level there was in particular the Food Safety Act (1990) in the United Kingdom<sup>1</sup>. This introduced the idea of 'Due Diligence' into the feed sector: companies had to show that they had done everything possible to ensure that the food materials for which they were responsible were safe for the consumer.

The carrying out of audits at the supplier which were aimed at food safety was from that point considered necessary for 'Due Diligence'.

Due to the difference in liability, this system was concentrated on suppliers of private labels which came into the shops under the name of the distributor.

<sup>&</sup>lt;sup>1</sup> With the introduction of the UK Food Safety Act in 1990, the statutory 'due diligence' defence became the main driver to formalise the process of food premise inspection by UK retailers. Under this legislation, it was no longer acceptable for a retailer to rely on a 'warranty' defence, if legal proceedings were presented.

Under section 21 of the Food Safety Act there is provision for a general defence of "all reasonable precautions and all due diligence" against principal offences in the Act, i.e.:

<sup>&</sup>quot;...it shall...be a defence for the person charged to prove that he took all reasonable precautions and exercised all due diligence to avoid the commission of the offence by himself or by a person under his control."

The Food Safety Act 1990, Guidelines on the Statutory Defence of Due Diligence published in February 1991 laid down guidance for any organisation within the food chain wishing to use the due diligence defence.

The relationship that existed between the individual retailer and it's suppliers was recognised by those involved with the development of the Guidelines, and the considerable influence of the retailer over recipe formulation, standards existing within the production environment and control systems was reflected by the content of the document. The responsibility for the safety and legality of product was now shared between the supplier and the retailer, with emphasis for the retailer being placed on **five main areas of control**, namely:

a) to ensure the presence of a detailed specification, which is not unlawful or inconsistent with any compositional standards or good manufacturing practice

b) to ensure that they satisfy themselves that a supplier is competent to produce the specified product and complies with legal requirements and operates systems of production control in accordance with good manufacturing or agricultural practice

c) from time to time, make visits, where practical to verify the competence of the supplier or receive the result of any other audit of the suppliers system for that purpose

d) establish a risk assessed programme for product examination, testing or analysis

e) to monitor and act upon customer complaints

From the first half of the 1990s, each distributor had his own auditors who carried out HACCP and hygiene audits at his suppliers both at home and abroad.

The next step was for certain audit and consultancy firms to be tasked with this on the basis of many so-called works books. By around 1995, there were dozens of works books, depending on the sector (for example British Frozen Food Federation), from the distributor or from the audit office (EFSIS, TLC). The result was that suppliers, depending on the customers, were visited by auditors a number of times per year, each with their own focus and requirements with respect to HACCP, hygiene and quality system. This was an extremely expensive system.

It was for this reason that the British Retail Consortium - BRC drew up its own checklist in 1998 entitled: 'Technical Standard and Protocol for Companies Supplying Retailer Branded Food Products'. It is generally considered to be desirable when further implementing the supplier assessment in the feed sector to avoid these developments because it was a counter-movement from an already existing joint certification scheme.

Forms of supplier selection and assessment have also developed beyond the food sector. A well-known example is the way in which veterinary medical product companies carry this out within the framework of of the so-called GMP-Pharma Code. Characteristic of this is the thorough screening of producers of raw materials. In addition, there is a 100% entry check for all units in a delivered batch in which strict rejection norms are used. This entry check continues even in the case of a long-term relationship with suppliers so that good results are obtained and maintained.

#### 4.2 The supplier assessment in the GMP+ FC scheme

In the GMP+ FC scheme there is an obligation for customers to assess and select suppliers and periodically to evaluate the suppliers which are approved. These requirements are formulated in general terms and match other, much-used and internationally-accepted safety standards in the food sector such as ISO 9001, ISO 22000, BRC and IFS.

Account has however been taken in the GMP+ FC scheme of the fact that the so-called third-party certification in the feed sector will be fully applied although that is the case to a much lesser extent in the foodstuffs sector. The GMP+ FC scheme is a chain system. Each link in the chain must guarantee on the basis of equal principles the safety of feed (products) as expressed in (product) norms. The basic requirement for the purchase of feeds and services is that the supplier must have a quality system which is certified by an independent body and which is focused on feed and food safety.

The third-party audit (for example the certification audit) is not a *replacement* for the supplier assessment or vice versa. The supplier assessment is a full part of a company feed safety system including in a situation where, as in the feed sector, third-party certification is required almost completely.

The carrying out of a supplier assessment is a responsibility of the company itself. It is a misconception that a feed company which only purchases from certified suppliers no longer has to carry out its own supplier assessment.

The general requirement that the suppliers must be certified (a basic requirement in many feed safety schemes including the GMP+ FC scheme) only lays a foundation for the successful selection of suppliers.

#### 4.3 Elements and keywords

Five elements can be distinguished with respect to supplier assessment. As a customer this means:

- 1. that you have detailed specifications which are in accordance with the legislation and with the requirements of the relevant standards for good manufacturing practice
- 2. that you select suppliers on the basis of their ability to:
  - a) deliver the specified product which complies with the legal requirements
  - b) work in accordance with systems for good manufacturing practice
- 3. regularly visit suppliers to assess whether they can meet their obligations in the field of food safety or to assess results of audits which were carried out at the suppliers in question
- 4. carry out a monitoring programme established on the basis of a risk assessment
- 5. record complaints and deviations and handle them correctly

These elements have been used as an important basic principle for this guide.

Important keywords for the above steps are:

- 1. exchange of *information* between the customer and the (potential) supplier,
- 2. *insight* into the quality assurance used by the supplier and his attitude to quality assurance, and
- 3. the *own responsibility* of each link or company in the chain with respect to the delivery of safe feeds.

#### Re. 1) Information

The customer must set up and implement the supplier assessment in a structured way. In order to be able to make a good assessment of products and suppliers, it is necessary to be properly informed about the product, the production process and the way in which established risks are controlled by the supplier. This information should be supplied by the (potential) supplier, preferably in a structured way.

This method of working ensures that the customer also has information about established risks and their control. Normally this data does not form part of the specifications given to the customer by the supplier. The extra information is specific to the product and the company where this product is made and forms to some extent a part of the risk communication between the supplier and the customer.

It offers the customer an opportunity to make a proper consideration of whether, in view of his own production process, he can use the product in the preparation of feed or can supply it to other links in the chain and serves as such as an input to the supplier assessment.

#### Re. 2) Insight

It provides the customer with an insight into the way in which the supplier has guaranteed the feed safety of the product and says something about the attitude of the supplier with respect to feed safety. The customer can match the entry check and the method of working including the control measures to this.

#### Re. 3) Own responsibility

The customer, by assessing suppliers in this fashion, provides proper compliance with the legal requirement demonstrably to take responsibility with respect to the products which are made or traded by him. This matches the emphasis given to this by the General Food Law (considerations 23, 29, 30, Article 17 first section and Article 20 of Regulation (EC) no. 178/2002) and the Feed Hygiene Regulation (considerations 6, 7, 8, 14, 23 and Articles 2, 4, 5, 6 and 7 of Regulation (EC) nr. 183/2005).

### 5 The supplier assessment

#### 5.1 Basic principles

The supplier assessment is an important instrument for a company in controlling feed safety. It covers the whole process of selection, assessment, approval and periodic evaluation of the supplier including any supply chains.

The supplier assessment should be set up and implemented systematically. It is quite feasible that a company carries out the supplier assessment together with other customers in order to share the costs and knowledge. Each company retains its own responsibility in this case for correct implementation.

The assessment should preferably cover all suppliers of raw materials, additives and services. The way in which the assessment takes place depends on the effect which a purchased product or service can have on the end product. Cleaning agents which are used during the cleaning of machines require different attention than those with which the canteen is cleaned.

Obviously, a customer buys only from suppliers for whom the assessment has been positive. Buying a product or service on impulse from supplier who has not been assessed does not happen.

#### 5.2 The supplier assessment step for step

#### 5.2.1 Exchange of information

A good supplier assessment starts with the exchange of information between the (potential) supplier and the customer. The customer enters into agreements with the supplier about the provision of information on:

a) the product to be supplied, the production process and its control.

This information should preferably be supplied systematically by, for example, a so-called feed safety sheet.

A model of a feed safety sheet is included in Appendix 1. The customer uses the feed safety sheet later in the actual supplier assessment.

b) the functioning of the feed safety system of the supplier

For example, information about the results of the monitoring and verification carried out by the supplier, his management review or external and internal audits held at the supplier.

#### 5.2.2 The initial supplier assessment

The customer then carries out an assessment. This includes at least the following steps:

a) The customer verifies that the (potential) supplier and the product to be supplied are approved under the GMP + scheme. A prerequisite is that there is a valid certificate available.

This certificate should be available if feeds (feed materials, compounds feeds, premixes or feed additives) and certain services (transport, storage) are purchased.

Approved certificates are recorded in GMP+ BA10 Minimum Requirements for Purchasing. In summary:

- a. The supplier is GMP+ certified.
- b. The supplier is certified on the basis of another standard which is approved in the GMP+ FC scheme.

Certain feeds and services may, by the way, be bought without one of the above certificates. The customer must in that case meet a number of additional requirements.

It is particularly important to establish whether the product to be received falls within the scope of the certificate of the supplier.

b) In the case of a supplier of a feed material the customer will find out whether there is a generic risk assessment for this feed material in the Feed Support Products.

Only feed materials for which a generic risk assessment has been included in the Feed Support Products will be accepted in the GMP + scheme and may be used for the production of feed.

c) The customer analyses the collected information about the supplier and the product with respect to feed safety aspects.

This is done on the basis of data which is specified in the generic risk assessment in the Feed Support Products and in the feed safety sheet provided by the supplier. Any other available data such as monitoring results from the supplier or audit reports.

The participant decides on the basis of the above:

- a) whether he approves the supplier,
- b) which information (for example monitoring results) he wishes periodically to receive from the supplier
- c) which entry check he will additionally carry out on the products to be received from this supplier,
- d) which control measures he wishes to take if any.

Obviously the customer will record the reason for the decisions including any agreements with the supplier. This makes it clear to everyone (both external and internal) how the assessment process was done.

It is also advisable for reasons of communication to feed back the results of the assessment to the supplier. This is certainly important if possibilities for improvement are observed. These can be used by the supplier.

#### 5.2.3 The periodic reassessment

It is also important from time to time to reassess the status of all suppliers. The customer must also take this on systematically. It is preferable to insert this reassessment into the yearly cycle in which the evaluation of complaints, the internal audit and the management review are carried out.

For the reassessment the customer will collect relevant data per supplier and analyse this. In addition to the items specified in 4.2.2 the customer also includes in the assessment:

- a) the results of his own entry check and monitoring possibly supplemented with other information (for example information provided by the supplier about deviations, audit results, monitoring, etc.)
- b) the recorded and handled complaints and deviations in as far as they relate to the suppliers and the products delivered by them.

On this basis the customer decides:

- a) whether he will continue to approve the supplier
- b) which entry check he wishes to carry out on the products to be received from this supplier
- c) which control measures if any he wishes to take
- d) whether a visit to the supplier is desirable

The frequency of holding evaluation meetings depends on the nature and the risk profile of the product to be obtained, the results of the monitoring, the results of previous discussions, possible complaints or shortcomings, etc.

New suppliers should be given special attention when establishing the frequency.

The results of the re-assessment are also recorded by the customer and preferably exchanged with the supplier so that opportunities for improvement are made use of.

#### 5.2.4 Visit to the supplier

During a company visit at least the following items are addressed:

- a) the quality assurance used by the supplier where there is also an assessment of the local and the method of working,
- b) the information provided in the feed safety sheet,
- c) the monitoring results (from the participant and/or the supplier/manufacturer)
- d) the recorded complaints, deviations and items for improvement and their followup.

The customer also ends this stage with a decision.

- a) whether he will continue to approve the supplier
- b) which entry check he will additionally carry out on the products to be received from this supplier
- c) which control measures if any he wishes to take

The customer will make a short report of the company visit in which he will record his findings. The results of the visit are exchanged with the supplier so that opportunities for improvement are made use of. Further agreements can also be made for the future.

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### Appendix 1: The feed safety sheet

A feed safety sheet is intended to provide information in a structured way about the product, the production process and the safety measures used,

A model of this is shown below. Note:

- The model shown is an example. The point is that the information should be shown systematically.
- Possibly not all the information has been provided by the manufacturer in full, certainly not if the product comes to the end user via a trade channel. In that case each link can add to the information (for example with details of transport, interim storage, etc.).

See the explanation (below) for instructions which can be useful when completing this sheet.

FEED SAFETY SHEET			0.1. Product	
			0.2. Version number	
			0.3. Version date	
Responsibility for the feed safety sheet				
1.1.	Name			
1.2.	Address			
1.3.	Approved by			

2. Id	lentification of the product					
2.1.	Product name					
2.2.	Trade name					
2.3.	Article code					
2.4.	Permit number					
2.5.	Product description					
2.6.	Origin					
2.7.	Supplied by					
3. Pr	oduct description					
3.1.	Production process					
3.2.	Raw materials and auxiliary substanc- es used (including feed additives and processing aids)					
3.3.	Logistical process (transport, (interim) storage, packag- ing)					
3.4.	Storage life					
3.5.	Indicative analysis	Parameter	Unit	Aver- age	Min.	Max.

4. No	4. Norms / requirements					
4.1.	Relevant legislation and other requirements.					
4.2.	Relevant norms / requirements (chemical, physical, microbiological)	Parameter	Unit	Statu- tory	Con- tractual	Internal
4.3.	Intended use					
4.4.	Storage and retention conditions					
4.5.	Transport require- ments					
4.6.	Processing instructions					
5. La	5. Labelling					

6. HACCP						
6.1. Hazard			6.3. Control measure	6.4. Reason		
	Cat. (C, M, F)	chance	serious- ness	risk		
7. Mo	nitoring					
7.1. Pa- rameter	7.2. Sampling moment / point 7				7.3. Frequency of	analysis
8. Re	marks					

# Explanatory note to the feed safety sheet

Field	Subject	Explanation
0.	Identification of the feed safety sheet	Field 0 identifies the feed safety sheet. For the purposes of correct identification this field is repeated on each page of the feed safety sheet.
0.1.	Product	Product name
0.2.	Version number	Version number of the feed safety sheet.
0.3.	Version date	Date on which the version was adopted and put into circulation.
1.	Person responsible for the feed safety sheet	This field identifies the author of the feed safety sheet. This will generally be the producer of the product but may be the supplier.
1.1.	Name	Identify the organisation which is responsible for the feed safety sheet.
1.2.	Address	Specify the full address, telephone number, etc. Preferably also specify the E-mail address and website.
1.3.	Approved by	Specify the person who authorised the feed safety sheet.
2.	Product identification	Field 2 gives an accurate identification of the product.
2.1.	Product name	Identify the product Use the designation as prescribed in the legislation. For feed materials the designation is determined in accordance with Directive 96/25/EC. The designations of feed additives should be in accordance with Regulation (EC) no.1831/2003.
2.2.	Trade name	State here the usual brand name of the product.
2.3.	Article code	Internal company article number. Specify "n/a" if no use is made of an internal company article number.
2.4.	Permit number	Statutory certification number. State "n/a" if the legislation does not recognise a permit number.
2.5.	Product description	Description of the product preferably in accordance with Regulation (EU) No 68/2013 on the Catalogue of feed materials.
2.6.	Origin	Describe the origin as accurately as possible. Possibilities are:  - Name and address details of the producer - Address details of the production location - Country of origin
2.7.	Supplied by	If different to 2.6.

Field	Subject	Explanation
3.	Product description	Field 3 describes the characteristics of the product.
3.1.	Production process	Brief but as accurate as possible description of the production process of the product including a flow chart.
3.2.	Used raw materials and auxiliary substances	All the raw materials and auxiliary substances used (including processing aids)
3.3.	Logistical process	Describe the logistical process gone through by the product from the (primary) production up to and including delivery to the end-user.  State the method of transport of the product, any (interim) storage and the method of packaging in the various stages in the logistical process.  NOTE: the norms and requirements with respect to storage, retention, packaging and transport conditions are
3.4.	Storage life	Indication of the storage life (number of days, weeks, months) of the product (for example, after production).
3.5.	Indicative analysis	This should include a number of relevant characteristics which classify the product. These will generally be non-binding nutritional parameters (such as dry-matter content, raw protein, raw fat, raw cellulose, ash) or the level of active substances (for example in feed additives).
4.	Norms / Requirements	Field 4 describes the norms and requirements.
4.1.	Relevant legislation and other requirements.	Summary of the relevant parts of the feed legislation. This may be the applicable European directives and regulations but may also be national legislation and regulations.  'Other requirements' may be specific requirements which apply within the framework of a specific feed safety scheme in which the customer participates. For example the GMP+ FC scheme
4.2.	Relevant norms / requirements	This relates to the detailed data and not a reference to the legislation or GMP+ FC scheme. The binding nutritional parameters are included here and also the parameters which are considered to be important in the risk assessment (such as heavy metals in minerals, mycotoxins in grains, PCBs in fats).
4.3.	Intended use	Describe the intended use of the product. For example - processing in compound feeds - direct feeding to animals - only processing in premixes - possibly the animal type if this is important etc.

Field	Subject	Explanation
4.4.	Storage and retention conditions	Binding requirements for storage and retention. For example:  - storage at a particular temperature - ventilation during storage - acidification before storage - air-tight closure
4.5.	Transport requirements	Binding requirements for transport.
4.6.	Processing instructions	The measures are indicated here which must be taken to be able to use the product correctly and safely. For example:  - to be used within x days of delivery - maximum processing percentage - minimum or maximum processing temperature
5.	Labelling	Statement of the way in which the product information is issued. This may be a sample label, a description of the legally-prescribed specifications or an accurate and specific reference to relevant legislation and regulations (a general reference to legislation or regulations is not enough).
6.	НАССР	This field provides a summary of the risk analysis for the product. At least the CCPs (Critical Control Points) are given and also general control measures.
6.1.	Hazard	Precise description of the hazard.
6.2.	Risk assessment	For the risk assessment preferably use the system which is prescribed in the GMP+ FC scheme. NOTE: If another system is used then you should indicate this explicitly (in field 8).
6.3.	Control measure	Description of the (specific) control measures which have been established by way of HACCP for the product.
6.4.	Reason	Motivation and argument for the risk assessment, especially with respect to the elements "chance" and "seriousness".
7.	Monitoring	This field provides a detailed description of the monitoring used in the company (checks, analyses) at the indicated critical points and general control measures.
7.1.	Parameter	Describe the characteristic to be examined (for example Aflatoxin B1, Salmonella, Lead, Prussic Acid).
7.2.	Sampling moment / point	Describe the point in the production process where the sample is taken or the inspection takes place (for example free on wagon reception, check before delivery).

Field	Subject	Explanation
7.3.	Frequency of analysis	Describe the frequency at which the monitoring is carried out (for example every batch, 4 times per year, every 10 <sup>th</sup> batch).
8.	Remarks	
8.	Remarks	Other comments may be placed in this field which are important for this feed safety sheet If a different HACCP system is used than that which is described in GMP+ FC scheme, then this can be described in this field.



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