



# GMP+ BCN-IP (Andorra, Spain, Portugal)

GMP+ D 3.23

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**GMP+ Feed Certification scheme**



# Index

<b>1. INTRODUCTION</b> .....	<b>4</b>
<b>2. GENERAL, APPLICATION &amp; CERTIFICATION</b> .....	<b>5</b>
2.1. WHY IS THIS COUNTRY NOTE GMP+ BCN-IP CREATED? .....	5
2.2. APPLICATION OF THIS COUNTRY NOTE GMP+BCN-IP.....	5
2.2.1. <i>When can this Country Note be applied?</i> .....	5
2.2.2. <i>How long can this Country Note be applied by a company?</i> .....	5
2.2.3. <i>Should I choose between a certification with GMP+ BCN-IP or normal requirements?</i> .....	5
2.2.4. <i>Should labelling of my products make reference to GMP+ BCN-IP?</i> .....	6
2.2.5. <i>Can an already GMP+ FSA certified company apply this GMP+ BCN-IP?</i> .....	6
2.2.6. <i>In which cases could a GMP+ FSA certified company need this CN?</i> .....	6
2.2.6.1. <i>Approval of non-GMP+ FSA certified suppliers</i> .....	6
2.2.6.2. <i>Exclusion of part of the production in a GMP+ FSA certified company</i> .....	7
2.2.6.3. <i>Subcontracting of transport services in Iberian Peninsula by GMP+ FSA certified transport companies</i> .....	7
2.2.6.4. <i>Subcontracting of transport services in Iberian Peninsula by GMP+ FSA certified storage and transshipment companies (stevedores)</i> .....	7
2.2.7. <i>Why does this CN allows producers to exclude part of their production from their GMP+ certification?</i> .....	8
2.2.8. <i>Cases in which a transport company located in the Iberian Peninsula cannot apply this CN</i>	8
2.2.9. <i>Should a company use the CN for excluding the production of Pet Food?</i> .....	8
2.2.10. <i>How can a GMP+ FSA certified company add the scope of GMP+ BCN-IP to its certificate?</i> .....	8
<b>3. PURCHASE OF NON-ASSURED FEED MATERIALS (“GATEKEEPING”)</b> .....	<b>9</b>
3.1. <i>CAN I APPLY THE COUNTRY NOTE FOR PURCHASING OF COMPOUND FEED AND/OR PREMIXTURES?</i> .....	9
3.2. <i>CAN BCN-IP HELPS A COMPANY IN THE PROGRESSIVE CERTIFICATION OF ITS DIFFERENT SITES?</i> .....	9
<b>4. MONITORING REQUIREMENTS</b> .....	<b>10</b>
4.1. MEANING OF “JOINT MONITORING PROGRAM” .....	10
4.2. WHY “JOINT MONITORING PROGRAM” IS ADDRESSED IN THIS CN? .....	10
4.3. WHO IS THE COORDINATOR OF THE JOINT MONITORING PROGRAM? .....	10
4.4. WHY GMP+ MONITORING DATABASE IS USEFUL FOR COMPANIES?.....	10
4.5. WHY IS IT MANDATORY TO INCLUDE ANALYTICAL RESULTS IN THE GMP+ MONITORING DATABASE UNDER SCOPE OF COUNTRY NOTE IBERIAN PENINSULA? .....	11
4.6. <i>HOW SHOULD I SUBMIT THE ANALYTICAL RESULTS TO THE GMP+ MONITORING DATABASE?</i> .....	11
<b>5. SUPPLIER IMPROVEMENT PROGRAM</b> .....	<b>12</b>
5.1. WOULD GMP+ INTERNATIONAL HELP IN THE DEVELOPMENT OF SUPPLIER IMPROVEMENT PROGRAMS? .....	12
5.2. WHO SHOULD DO THE SUPPLIER IMPROVEMENT PROGRAM? .....	12

5.3.	WHAT HAPPENS IF I CANNOT REACH THE 100% COMPLIANCE WITH THE REGULAR GMP+ REQUIREMENTS AFTER 4 YEARS.....	12
5.4.	WHAT IS THE FREQUENCY OF SUPPLIER AUDITS UNDER GMP+ BCN-IP CONDITIONS?.....	12
5.5.	SHOULD THE COMPANIES INFORM TO GMP+ INTERNATIONAL EACH TIME THAT THEY HAVE A NEW SUPPLIER UNDER GATEKEEPER PROTOCOL GMP+ BCN-IP? .....	13
5.6.	SHOULD THE COMPANY INCLUDE ALL ITS SUPPLIERS IN THE SUPPLIER IMPROVEMENT PROGRAM?.....	13
<b>6.</b>	<b>GATEKEEPER PROTOCOL FOR ROAD TRANSPORT COMPANIES.....</b>	<b>14</b>
6.1.	HOW APPLICATION OF GATEKEEPER PROTOCOL FOR SUBCONTRACTING TRANSPORT SERVICES SHOULD BE CONTROLLED IN THE SAFETY MANAGEMENT SYSTEM BY A TRANSPORT COMPANY?.....	14
6.2.	HOW THE CUSTOMER WILL CONFIRM THAT TRANSPORT COMPLIES WITH GMP+ REQUIREMENTS?.....	14
6.3.	HOW LONG THIS GATEKEEPER PROTOCOL CAN BE APPLIED?.....	14
6.4.	CAN A COMPANY USE THIS GATEKEEPER PROTOCOL FOR TRANSPORTING FEED WORLDWIDE?.....	14
6.5.	HOW THE GMP+ AUDITOR WILL ASSESS THE CORRECT APPLICATION OF THIS GATEKEEPER PROTOCOL?.....	15
6.6.	WHO CAN CARRY OUT THE ANALYSIS OF CLEANING WATER AFTER RELEASE PROCEDURE OF LOADING COMPARTMENT?.....	15
6.7.	DOES THE BCN-IP INCLUDE SPECIAL REQUIREMENTS LOADING INSPECTOR OR ON INSPECTION CERTIFICATE OF LOADING COMPARTMENTS?.....	15
	<b>ANNEX 1: EXAMPLES FOR APPLICATION OF THE COUNTRY NOTE.....</b>	<b>16</b>

# 1. Introduction

In the process of developing the standard GMP+ BCN-IP Specific requirements for Iberian Peninsula (Andorra, Spain, Portugal), GMP+ International received questions about the background, scope and implementation.

This document addresses the most frequently asked questions and is intended as a guidance to the GMP+ participant for better understanding and implementation of the requirements of GMP+ BCN-IP.

*Should you have any further questions or would like to receive more information, you can always contact us via our [contact form](#) or sending an email to [info@gmpplus.org](mailto:info@gmpplus.org). If considered necessary, new information and guidance will be added to this FAQ-list.*

## 2. General, application & certification

### 2.1. Why is this Country Note GMP+ BCN-IP created?

The feed sector in the Iberian Peninsula (Andorra, Spain and Portugal) is on top positions in European market on volume of feed production. However, only a few feed companies have implemented a feed safety management system which is GMP+ FSA or equivalent certified. The interest in feed certifications and their implementation has grown exponentially in the last years. However, companies are still faced with limitations in complying with GMP+ requirements and implementing GMP+FSA.

The Country Note is part of the GMP+ FSA module. It provides specific conditions and stipulations which will enable Iberian Peninsula feed companies to participate in the GMP+ Feed Certification scheme.

It has been prepared in close cooperation with representatives of Spanish feed companies, and experts from the Iberian Peninsula feed industry.

### 2.2. Application of this Country Note GMP+BCN-IP

#### 2.2.1. When can this Country Note be applied?

This CN can be applied when a specific situation from Iberian Peninsula sector limits full application of a regular GMP+ standard/scope. Some examples will be described in Annex 1. Its application is always in combination with a relevant basic GMP+ standard/scope.

#### 2.2.2. How long can this Country Note be applied by a company?

Companies located in Iberian Peninsula can apply the GMP+ BCN-IP for a maximum of 4 years (until May 2023, the expiration date of this CN). GMP+ International's historical results with Country Notes in other countries show that most companies do not need the CN until the official deadline. In other words, companies comply with normal requirements within 4 years of starting with GMP+ feed safety assurance.

#### 2.2.3. Should I choose between a certification with GMP+ BCN-IP or normal requirements?

The desirable situation is the certification under normal requirements (without application of this CN). However, when the market has limitations, you can choose: to apply for a regular GMP+ standard in combination with the Country Note. The CN can only be applied additionally, not stand-alone. It gives the company more options to implement a feed safety management system that assures feed safety on the desired level and taking into account the specific structure of the feed market on the Iberian Peninsula. However, the options in the CN do not have the preference of the GMP+ FC scheme and can therefore only be applied temporarily (max. 4 years).

When this CN is applied in combination with a GMP+ standards in order to achieve the required level of feed safety, the certificate/scope of this company will additionally make reference to this Country Note. Example of the information mentioned in GMP+ Companies database:

- Standards: GMP+ B1 Production, Trade & Services & GMP+ BCN-IP Specific requirements for Iberian Peninsula
- Scope: Production of Compound Feed & Production of Compound Feed GMP+ BCN-IP

Reminder: By comparison, the information mentioned in GMP+ Company database when normal requirements are met (without CN) is as follows:

- Standard: GMP+ B1 Production, Trade & Services
- Scope: Production of Compound Feed

#### 2.2.4. Should labelling of my products make reference to GMP+ BCN-IP?

No. The labeling and positive declaration requirements are the same for all the GMP+FSA certified companies. In the framework of this GMP+ BCN-IP a special labelling is not required.

#### 2.2.5. Can an already GMP+ FSA certified company apply this GMP+ BCN-IP?

Yes. When this is the wish of a company located in the Iberian Peninsula, a GMP+ FSA certified company can apply this CN. Its certification body must be informed in order to carry out the required actions (auditing, updating scope of certificate, etc.). This new information on the scope of certificate will be included in GMP+ certified companies database in order to inform worldwide.

#### 2.2.6. In which cases could a GMP+ FSA certified company need this CN?

Due to structure and characteristics of the feed sector in Iberian Peninsula, when a company falls into one of the following scenarios, the CN can be requested:

##### 2.2.6.1. Approval of non-GMP+ FSA certified suppliers

Currently, the number of GMP+ FSA certified companies in the Iberian Peninsula is relatively small. Consequently, companies have difficulties to find local GMP+ FSA certified suppliers.

When the company wants to make use of new non-GMP+ FSA certified suppliers (or equivalent) and the normal gatekeeper protocols included in GMP+ BA10 do not address this situation, this CN can provide extra tools. Some examples can be:

- Approval of non-GMP+ FSA certified producers of feed materials
  - o This situation also includes feed material which is obtained as a by-product of the food industry. For instance: beet pulp (by-product from the sugar production in food sector) directly destined to feed sector.

The Gatekeeping option for purchasing non-assured feed materials described in GMP+BCN-IP could be temporarily used until the certification of that specific supplier(s).

- Approval of non-GMP+ FSA certified local traders, when the product comes from GMP+ FSA certified producers.

#### *2.2.6.2. Exclusion of part of the production in a GMP+ FSA certified company*

In the framework of this CN, the production companies are allowed to exclude part of their production from their feed safety assurance. This option can be useful when a company wants to perform productions of GMP+ assured and non GMP+ assured products on the same site. Excluded activities shall not have a negative effect on the safety of the assured feed

#### *2.2.6.3. Subcontracting of transport services in Iberian Peninsula by GMP+ FSA certified transport companies*

GMP+ FSA certified transport companies located in Iberian Peninsula frequently subcontract the transport service to freelance drivers or small transport companies. These subcontracted workers/small companies are non-GMP+ FSA certified companies by the moment. This CN temporarily allows – under certain conditions - these workers/small companies to be considered as employees of the GMP+ FSA certified transport company. The GMP+ FSA certified transport company is responsible of compliance with GMP+ requirements (and ensuring that its workers comply with the requirements).

#### *2.2.6.4. Subcontracting of transport services in Iberian Peninsula by GMP+ FSA certified storage and transshipment companies (stevedores)*

Port authorities only authorize certain transshipment companies to operate into Iberian Peninsula port. Some of these authorized transport companies are not (yet) GMP+ FSA certified. Consequently, the gatekeeper option is required by stevedores to ensure the transport activities.

The Supplier Improvement Program is not mandatory for stevedores since they cannot increase the % of subcontracted transport companies into port. However, stevedores have to promote the certification of these transport companies and, at the end of CN application, all transport activities into port must be GMP+ FSA certified.



### 2.2.7. Why does this CN allows producers to exclude part of their production from their GMP+ certification?

At this moment, suppliers of feed from the Iberian Peninsula are confronted with demands for assured feed from customers, mostly located in Central and North Europe. The local market demand is negligible. To satisfy both demands of assure feed and the local market, Iberian Peninsula producers are allowed to exclude part of their production in the same location from the certification. This possibility is allowed for the few coming years until the local demand (and consequently the implementation of feed assurance) reaches the European level. The Country Note can be applied for a maximum of 4 years (the expiration date of this Country Note is 2023)

### 2.2.8. Cases in which a transport company located in the Iberian Peninsula cannot apply this CN

Following cases are examples of scenarios in which the application of this Country Note by transport companies located in the Iberian Peninsula is not possible:

- When a transport company located in the Iberian Peninsula wants to subcontract to a non-certified transport company from other country different to Andorra, Spain and/or Portugal
- When the destination of transport is A-country (see list of A-countries in GMP+BA10)

### 2.2.9. Should a company use the CN for excluding the production of Pet Food?

No. GMP+ certified producers of feed can already exclude the production of Pet Food from scope with the normal standards. Application of the Country Note is not necessary in such cases.

### 2.2.10. How can a GMP+ FSA certified company add the scope of GMP+ BCN-IP to its certificate?

Modification in GMP+ certification scope must be done by the certification body. Therefore, the company must contact its certification body and inform on this required change: extend the scope to one or more of the certification scopes of the GMP+ BCN-IP. The certification body will be responsible of inform to the company on required actions / next steps.



## 3. Purchase of Non-Assured feed materials ("Gatekeeping")

Gatekeeper options included in Country Note Iberian Peninsula must be temporarily used. Besides, they can be only used on products excluded in scope of normal Gatekeeper options mentioned in GMP+ BA10.

This option is applicable to producers as well as traders. Therefore, it must be implemented in combination with requirements included in GMP+ B1 or GMP+ B2 in case of producers, and GMP+ B3 in case of traders.

Example: If a producer or trader wants to be GMP+ FSA certified but its suppliers are not GMP+ FSA certified, the producer/ trader can apply this country note and work as a gatekeeper to compensate for the lack of certification of its suppliers with extra controls. The gatekeeping is only a temporary solution.

### 3.1. Can I apply the country note for purchasing of compound feed and/or premixtures?

No. gatekeeper options included in BCN-IP are only available for feed materials. Compound feed and/or premixtures should come from GMP+ certified suppliers (or equivalent). Gatekeeping of compound feed and/or premixtures is not allowed anywhere.

### 3.2. Can BCN-IP helps a company in the progressive certification of its different sites?

Each location has its own GMP+ certificate in which different activities are included under the certification scope. If a company wants certify 2 locations (location A: producer; location B: trader) but in different moments, the following sequence could be used:

- a. Implementation of GMP+ FSA certification in trader location, location B.
- b. Thanks to certification under scope of BCN-IP in location B, purchasing of non-assured feed materials can be done. Therefore, trader can purchase non-assured feed materials from location A under gatekeeper conditions and sell them as GMP+ assured.
- c. Gatekeeping conditions under BCN-IP includes the Improving Supplier Program. Therefore, location B should achieve that all its suppliers are GMP+ certified (or equivalent) within a limited timeframe.

## 4. Monitoring requirements

### 4.1. Meaning of “joint monitoring program”

Several associations have implemented monitoring programs in certain regions of Spain. These programs are very useful and extensive on quality and safety control of feed products. Depending on the region, the monitoring is done in imported feed products (case of ports) or in produced feed (case of monitoring in internal Spanish regions).

Results of these monitoring programs are shared with associated members of each association. Besides, the different associations collaborate each other to coordinate activities to promote the feed safety as well as to inform on (suspected) alerts/incidents when contaminants are detected.

Although the working method of these monitoring programs is not equal in all the associations. Most relevant criteria are aligned among associations as well as with national and European legislation.

### 4.2. Why “joint monitoring program” is addressed in this CN?

The results from joint monitoring programs are an excellent source of information, providing historical and last-minute results, and are of help to get a clear picture of Spanish feed sector in each moment. Consequently, it is good reference for GMP+ certified companies and could be useful to comply with GMP+ monitoring requirements.

### 4.3. Who is the coordinator of the joint monitoring program?

Coordinator of each monitoring program is the specific association that is manager of that specific monitoring program. However, each individual GMP+ FSA certified company must assess and select the relevant information from these monitoring programs to meet the GMP+ monitoring requirements. Besides, it must be properly registered and described how it supports the Feed Safety Management System.

### 4.4. Why GMP+ Monitoring Database is useful for companies?

Transparency and collaboration are one of the most important points in GMP+ chain. The inclusion and sharing of analytical results in the GMP+ Monitoring Database is a very good way to share information with the GMP+ community. This is a true experience in countries in which the GMP+ FSA certification is already implemented; however, other countries need extra motivations to understand and endorse the benefits of sharing information. Countries where the Country Note is required (normally) needs this extra motivation/training. Thanks to the anonymous inclusion of the analytical results in the GMP+ Monitoring Database, all companies can parallelly preserve their confidentiality and contribute to ensuring the feed safety.

#### **4.5. Why is it mandatory to include analytical results in the GMP+ Monitoring Database under scope of country note Iberian Peninsula?**

Under the scope of Country Note Iberian Peninsula, additional gatekeeper options are available to purchase feeds from non-assured sources. Inclusion of analytical results to the GMP+ Monitoring Database is mandatory to provide information and transparency about safety to the market.

#### **4.6. How should I submit the analytical results to the GMP+ Monitoring Database?**

Submission of analytical results should be done via the normal procedures. There are no special requirement on it. Additional information/instructions on submission of analytical results to GMP+ Monitoring Database is available in GMP+ International website.

## 5. Supplier improvement program

### 5.1. Would GMP+ International help in the development of Supplier Improvement Programs?

GMP+ International will provide all the required support to properly understand the aim and working method of Supplier Improvement Programs. This support will be given via seminars, newsletters, workshops, trainings, etc.

However, the creation, implementation and maintenance of specific Supplier Improvement Programs into each company is the responsibility of the company itself.

### 5.2. Who should do the Supplier Improvement Program?

All company applying the chapter 5 or 6 of GMP+ BCN-IP must develop, implement and keep a Supplier Improvement Program. This program must be active until 100% compliance with the regular GMP+ requirements is achieved and the CN IP is not needed anymore.

### 5.3. What happens if I cannot reach the 100% compliance with the regular GMP+ requirements after 4 years.

Depends on the situation. Together with representatives of the local feed industry, GMP+ International will monitor the progress and development carefully. In cases in which a company would face external limitations that makes it impossible to achieve this goal, GMP+ International may assess this specific case and try to solve the situation with other temporary support, for instance, exemptions.

In the very unlikely case that the whole Iberian Peninsula feed sector cannot reach the aim, (parts of) the Country Note could be extended for few extra years. Until this moment, this situation has not occurred in any country with CN.

### 5.4. What is the frequency of supplier audits under GMP+ BCN-IP conditions?

Frequency of audits is as per the normal GMP+ requirements. It must be based on the risk analysis assessment.

### **5.5. Should the companies inform to GMP+ International each time that they have a new supplier under Gatekeeper protocol GMP+ BCN-IP?**

No. The correct application of Gatekeeper protocols will be controlled/supervised by auditors during GMP+ audits. GMP+ International only must be informed in case an exemption is required.

### **5.6. Should the company include all its suppliers in the Supplier improvement program?**

Only the suppliers/ volume of purchased feed used in the production under GMP+ FSA certification must be included in the Supplier improvement program. If the company is excluding part of its production from the GMP+ FSA certification, these suppliers (and volume of purchased product) are also excluded from Supplier improvement program.

## 6. Gatekeeper protocol for road transport companies

### 6.1. How application of gatekeeper protocol for subcontracting transport services should be controlled in the safety management system by a transport company?

GMP+ certified transport company (gatekeeper) should comply with requirements mentioned in BCN-IP and correctly register to proof compliance with them. Clear agreements with the transport companies, division of responsibilities, proper training, etc., must be done and correctly registered to proof compliance.

### 6.2. How the customer will confirm that transport complies with GMP+ requirements?

Customer, feed company, contracts the transport services with the GMP+ certified transport company, the supplier of this service. The GMP+ certified transport company is responsible of ensuring correct application of gatekeeper protocol and provides the required information (positive declaration for transport) to the feed company to confirm compliance with GMP+ requirements. As long as the product belongs to a GMP+ FSA certified company and, consequently, the applicable GMP+ requirements are met, the product can maintain its positive declaration (which must be according to the list with approved GMP+ declarations).

### 6.3. How long this gatekeeper protocol can be applied?

This special gatekeeper protocol for subcontracting road transport by GMP+ certified transport companies is part of GMP+BCN-IP which expires on May 2023. GMP+ transport companies can use it until that moment. However, application of this gatekeeper protocol is linked to the supplier improving program also included in the GMP+BCN-IP.

### 6.4. Can a company use this gatekeeper protocol for transporting feed worldwide?

No. GMP+BCN-IP must be implemented in combination with a relevant basic GMP+ standard/scope. Consequently, basic limitations also apply to special gatekeeper protocol for subcontracting road transport by GMP+ certified transport companies. In other words, this gatekeeper protocol can only be applied to assure road transport outside A-countries. See GMP+ BA10 Minimum Requirements for Purchasing, annex 9-Gatekeeper protocol for transport to obtain additional info on limitations.

### **6.5. How the GMP+ auditor will assess the correct application of this gatekeeper protocol?**

Assessment of this gatekeeper protocol will be done following the same procedure that assessment of other gatekeeper protocols. Each company/ involved participant must meet its responsibilities. E.g.:

- The gatekeeper, GMP+ certified transport company, is responsible of complying with GMP+ requirements and, consequently demonstrate the correct application of this protocol.
- Its customers should enter into a quality assurance agreement with the gatekeeper, the GMP+ certified transport company.

### **6.6. Who can carry out the analysis of cleaning water after release procedure of loading compartment?**

Release procedure of loading compartment after transporting a forbidden load is published in ICRT website. Country Note Iberian Peninsula includes a third option in which the last step request the analysis of cleaning water before and after use it for last cleaning. This analysis can be done by laboratories which has a system of analytical quality control accredited according to ISO 17025 or an animal feed laboratory with GMP+ B10 certification.

### **6.7. Does the BCN-IP include special requirements loading inspector or on inspection certificate of loading compartments?**

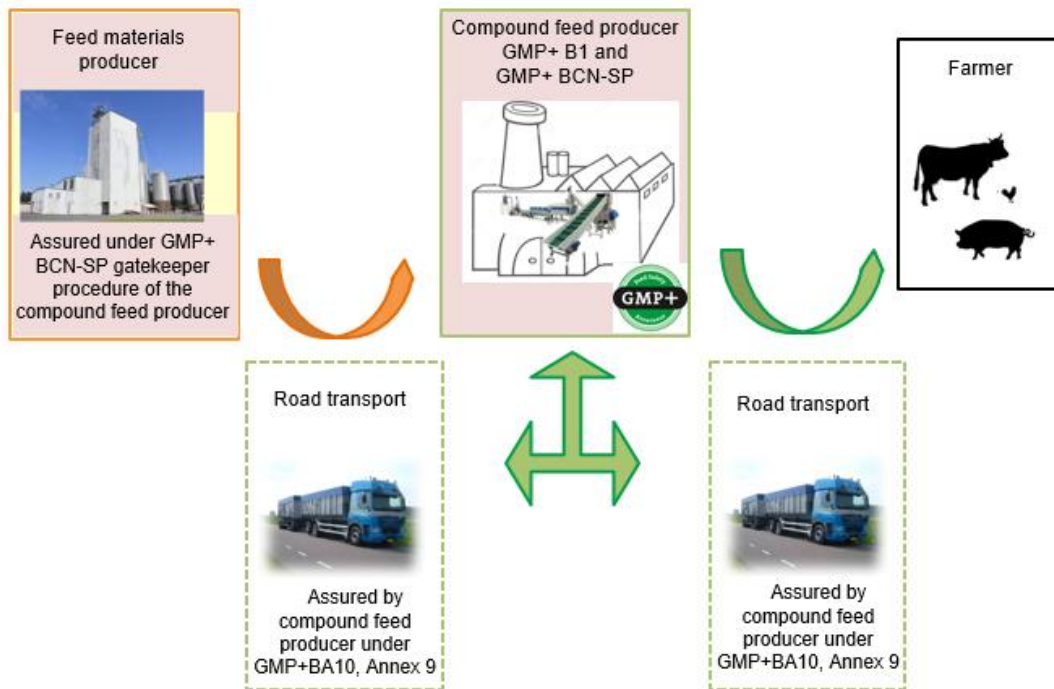
No. A "loading inspector" should comply with requirements included in basic GMP+ requirements. Inspection certificate will confirm a positive inspection.



## Annex 1: Examples for application of the Country Note

These are some examples for the application of the Country Note. Application is however not limited to these examples.

### 1. Purchase of processed feed materials from non-certified feed material suppliers



A compound feed producer applies the GMP+ B1-standard. He establishes a feed safety management system to assure the production of compound feed. He applies this Country Note for purchasing feed materials from non-certified feed material suppliers. These feed materials are processed in his compound feed. The compound feed producer assures the road transport under the gatekeeper protocol laid down in Annex 9 of GMP+BA10.

The scope of the certificate states:

- Production of compound feed – GMP+ BCN-IP

The free part for scope description on the certificate states the specific compound feed.

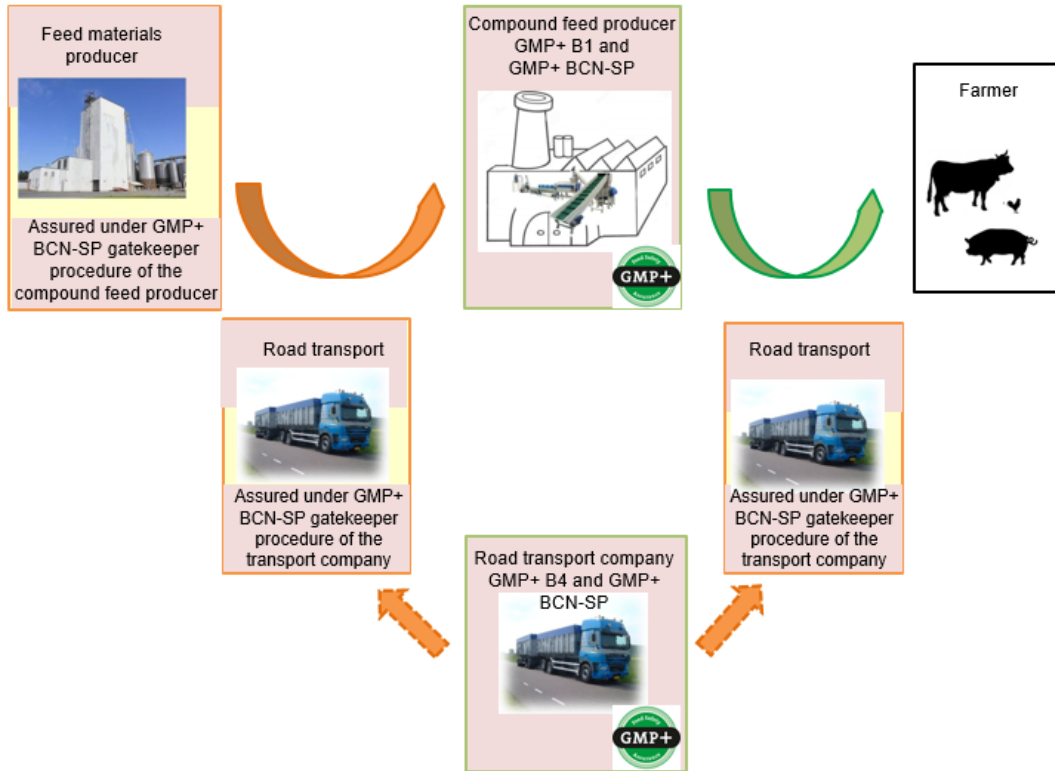
(Note: the non-certified feed material supplier can be a feed company or food company).

The above requirements are also applicable for a GMP+ B3 certified trader who purchase feed materials from non-certified feed material suppliers. The scope of the certificate states:

- Trade in feed materials- GMP+ BCN-IP

The free part for scope description on the certificate states the specific feed materials.

2. Purchase of road transport



A compound feed producer applies the GMP+ B1-standard. He establishes a feed safety management system to assure the production of compound feed. He applies this Country Note for purchasing feed materials from non-certified feed material suppliers. These feed materials are processed in all his compound feed.

Road transport is assured by a GMP+ certified transport company which obtained a written approval from the compound feed producer. For this the road transport company applies the gatekeeper protocol laid down in Annex 9 of GMP+BA10.

The scope of the certificate of the compound feed producer states:

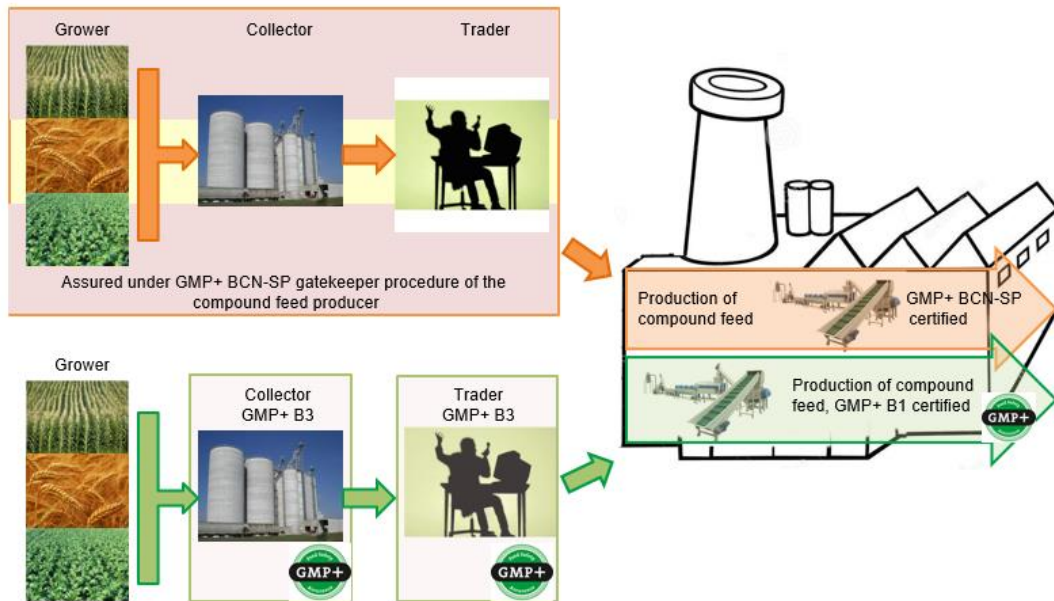
- Production of compound feed – GMP+ BCN-IP

The free part for scope description on the certificate states the specific compound feed.

The scope of the certificate of the transport company states:

- Transport of animal feed, Road transport - GMP+ BCN-IP

- 3. Production of non-GMP+ assured feed and GMP+ assured feed in the same location/facility:
  - 3.1. production of GMP+ B1 certified compound feed and GMP+ BCN-IP certified compound feed

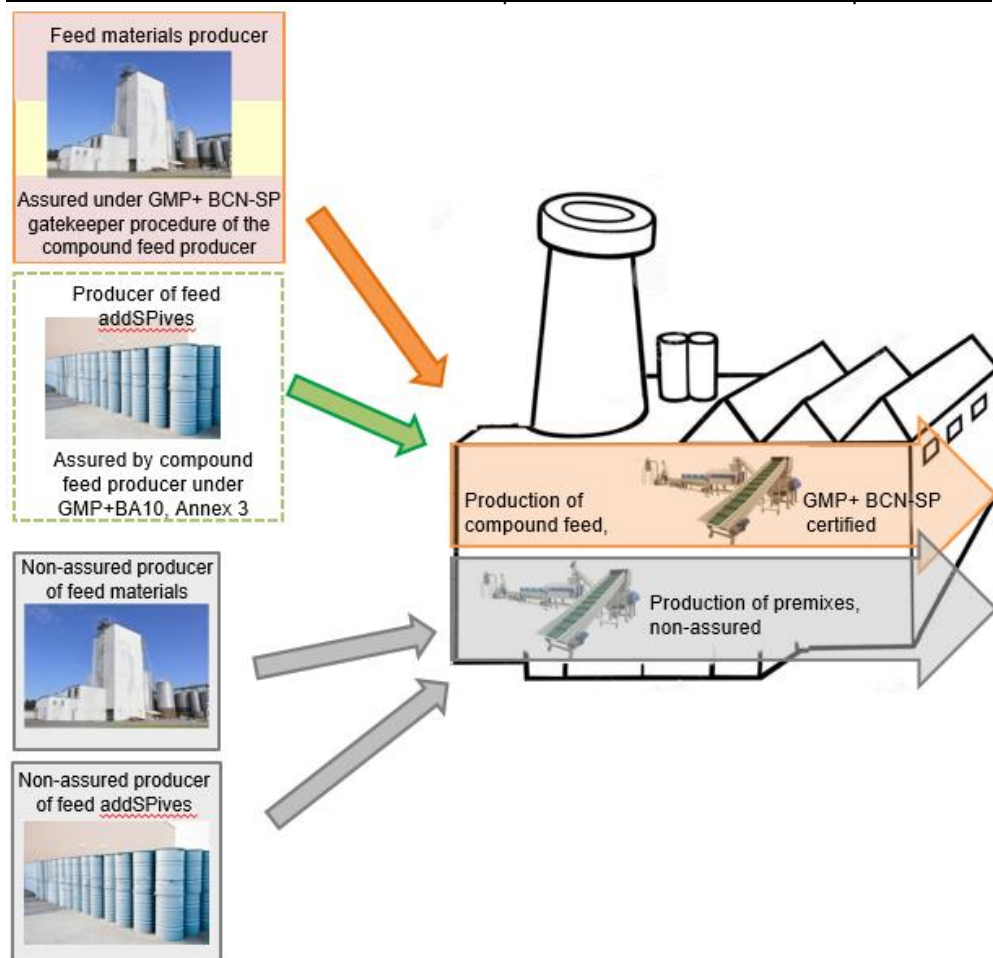


A compound feed producer applies the GMP+ B1-standard. He establishes a feed safety management system to assure the production of compound feed. He applies this Country Note for purchasing feed materials from non-certified feed material suppliers. These feed materials are processed in a part of his compound feed, for example only in compound feed for pigs. All other compound feed production is in compliance with the regular GMP+ FSA requirements.

The scope of the GMP+ FSA certificate states:

- Production of compound feed
- Production of compound feed – GMP+ BCN-IP

### 3.2. Production of GMP+ BCN-IP certified compound feed and non-assured premixtures



A compound feed producer applies the GMP+ B1-standard. He establishes a feed safety management system to assure the production of compound feed. He applies this Country Note for purchasing feed materials from non-certified feed material suppliers. These feed materials are processed in his compound feed.

He also applies the gatekeeper protocol laid down in Annex 3 of GMP+BA10 for purchase of feed additives. The compound feed producer also produces premixtures which are not covered by his feed safety management system.

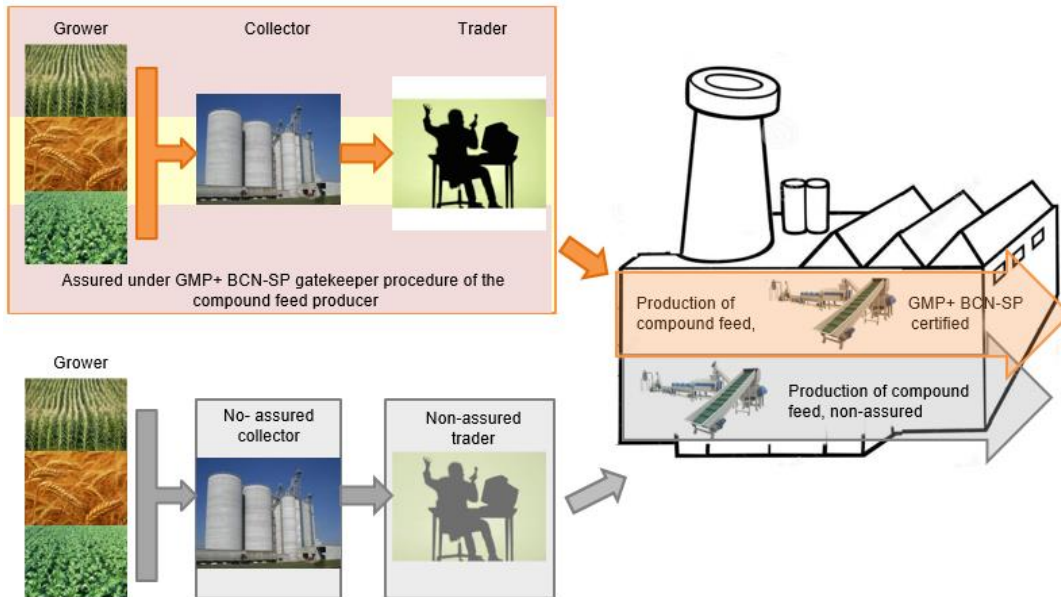
The feed safety management system shall such a separation between the production of compound feed and the production of premixtures at all stages of processing, producing, (internal) transportation and storage, that the safety of the compound feed is not affected.

The compound feed producer shall demonstrate overall compliance with the relevant requirements of this Country Note.

The scope of the certificate states:

- Production of compound feed – GMP+ BCN-IP

3.3. Production of GMP+ BCN-IP certified compound feed and non-assured compound feed



A compound feed producer applies the GMP+ B1-standard. He establishes a feed safety management system to assure the production of compound feed. He applies this Country Note for purchasing feed materials from non-certified feed material suppliers. These feed materials are processed in his compound feed.

The compound feed producer also produces compound feed which are not covered by his feed safety management system.

The feed safety management system shall assure a strict and complete physical and/or organisational separation between the production of compound feed assured under this Country Note and the production of non-assured compound feed at all stages of processing, producing, (internal) transportation and storage.

The compound feed producer shall demonstrate overall compliance with the relevant requirements of this Country Note.

The scope of the certificate states:

- Production of compound feed – GMP+ BCN-IP
- The free part for scope description on the GMP+ FSA certificate states the specific compound feed.

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