

# Policy document GMP+ Feed Responsibility

## 1. Introduction

GMP+ International manages the GMP+ Feed Certification scheme and provides certification for over 12,900 participants in the feed production chain on an international level. These participants are certified for GMP+ Feed Safety Assurance, but are more and more confronted in the market with the request to demonstrate that they meet feed responsibility principles.

Therefore, GMP+ International was confronted with the demand to provide services to facilitate companies for coping with these market demands. For that reason, providing services regarding feed responsibility has been integrated in the mission of GMP+ International in 2012.

In the Business plan 2013 – 2015 was formulated that GMP+ International should define a long-term, comprehensive policy regarding its role, ambition and strategies concerning feed responsibility. This document describes the intended policy of GMP+ International regarding GMP+ Feed Responsibility.

This policy document has been developed in close collaboration with representatives of the partners of GMP+ International. The start was a brainstorm session with them in February 2014. These partners were also consulted regarding the draft of this document in June 2014. All respondents supported this policy strongly.

## 2. External analysis

The following developments and signals are noticed in the market:

- a. Increasing world population (growth towards 9 billion people by 2050).
- b. Increasing purchasing power resulting into an increase in demand for animal proteins.
- c. Resulting in an increase of demand for feed (increasing the global sourcing of feed ingredients).
- d. A growing demand for feed safety & responsibility assurance originating from the food production chain (from livestock farming as well as in the aqua culture).
- e. Different opinions about the definition of responsibility.

There is a limited number of (international operating) upstream providers of responsible of sustainable primary products from terrestrial plant production as well as aquatic production, like for example:

- a. Round Table Responsible Soy, Round Table Responsible Palm Oil, Proterra and GlobalGap;
- b. Marine Stewardship Council (MSC).

Downstream initiatives in livestock farming and aqua culture are coming up, showing more interested in responsible production, including the feed component, like:

- a. Duurzame Zuivel. Kip van Morgen, Varkens van Morgen, Verband Lebensmittel Ohne Gentechnik
- b. Aquaculture Stewardship Council (ASC) and GlobalGap.

GMP+ FSA certified companies are more and more confronted with demands to demonstrate assurance of responsible feed production and trade. The GMP+ Feed Certification scheme could facilitate this demand via a one-stop-shop multiple certification.

### 3. Internal analysis

#### 3.1. Introduction

The GMP+ Feed Certification scheme was initiated in and developed from 1992 onwards by the Dutch feed industry in response to various incidents involving contamination in feed materials. Until 2013, the focus of the GMP+ Feed Certification scheme was only on the assurance of feed safety. Currently (July 2014) over 12,900 companies are certified worldwide.

As there is more and more interest in also certifying feed responsibility assurance, GMP+ International extended the scope of the GMP+ Feed Certification scheme to feed responsibility assurance besides feed safety assurance in 2013. For this purpose the GMP+ Feed Certification scheme consists of two modules:

1. GMP+ Feed Safety Assurance
2. GMP+ Feed Responsibility Assurance

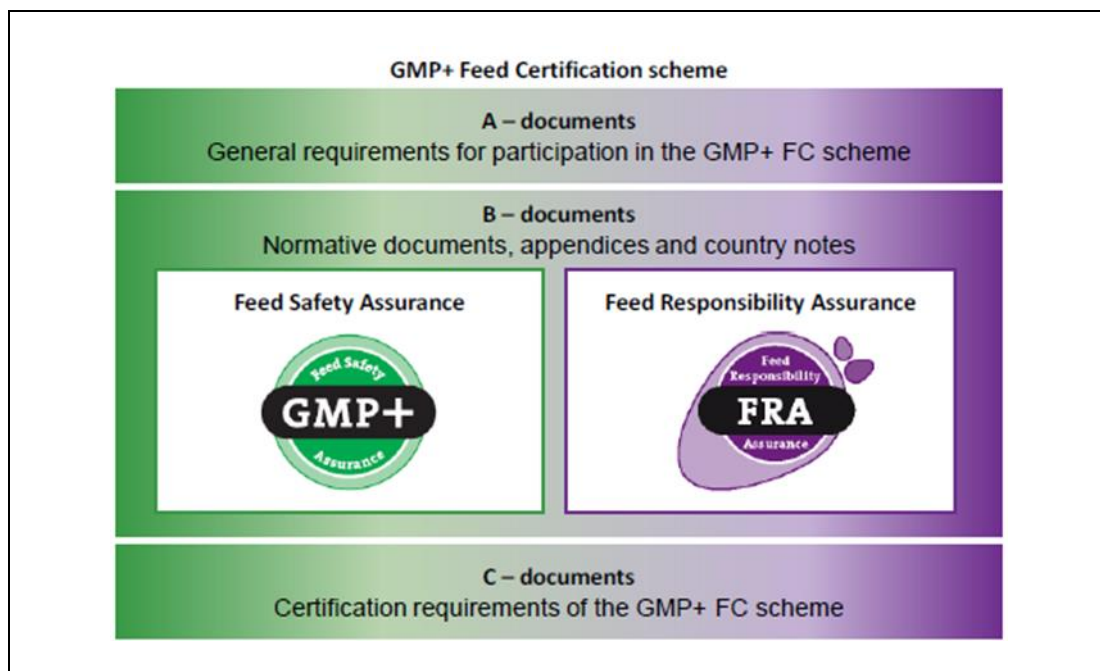


Figure 1: GMP+ Feed Certification scheme

The main goal of the GMP+ Feed Responsibility Assurance module is to facilitate GMP+ participants in meeting the market requirements for responsibly produced feed.

Until now (July 2014), the GMP+ Feed Responsibility module contains only one standard: the GMP+ B101 *Production and trade of responsible soy*. It is a chain-of-custody standard for responsible soy with scopes concerning the production and trade of RTRS soy.

### 3.2. Chain coverage

It is a strong believe, based on experience, that only if all links in the chain contribute to feed safety assurance, in the end a safe feed is delivered to the farmers.

This is why the GMP+ Feed Certification scheme has a strong chain approach. All links in the chain have their own responsibility. The final result downstream depends on the efforts regarding feed safety and feed responsibility assurance in the whole (previous) production chain.

For that purpose, the GMP+ Feed Certification scheme covers all links in the feed chain between primary production and livestock farming (and links afterwards: processing of animal products, retail and the consumer). The connection to the other links in the chain is made via purchasing requirements.

The opinion is that also to deliver a responsible feed, all links in the chain have to work together too.

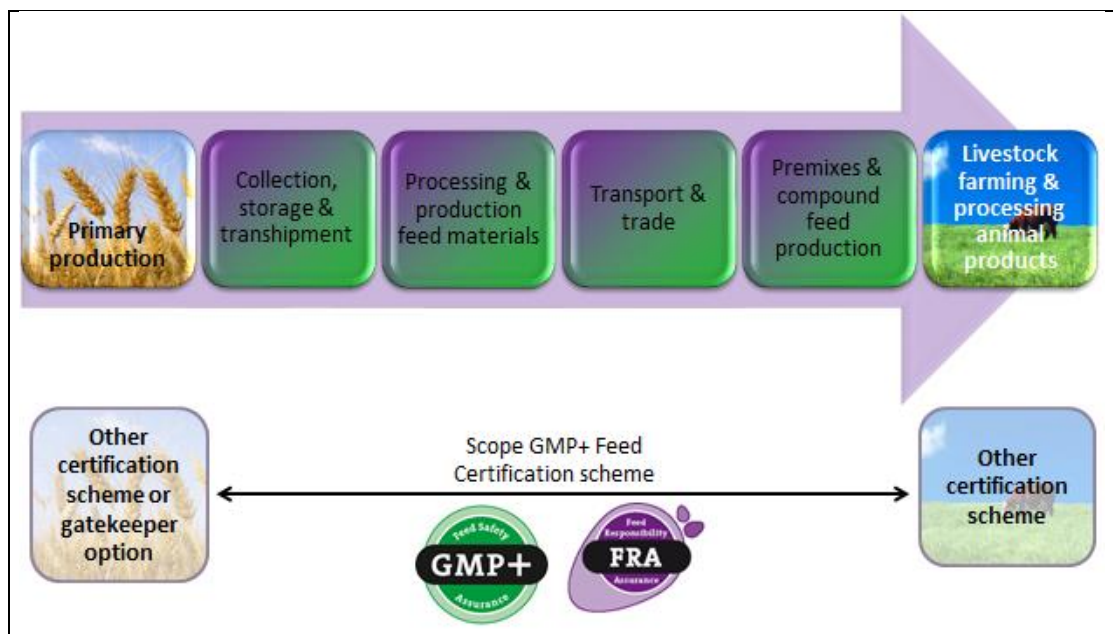


Figure 2: Scope of the GMP+ Feed Certification scheme (chain coverage)

The GMP+ Feed Certification scheme links feed responsibility & safety certification explicitly with national as well as international operating food scheme holders upstream and downstream regarding food responsibility assurance. GMP+ International doesn't have the intention to cover:

- the primary production, such as cultivation and fishery, as well as
- livestock farming and aqua culture.

### 3.3. Tools for assurance and certification

Within the GMP+ Feed Certification scheme, there are useful tools available for the assurance of both feed safety & responsibility in the daily operations of a company. Besides that, clear rules for certification by third parties (certification bodies) are laid down. The combination of tools for assurance and certification makes the GMP+ Feed Certification scheme suitable for certification of feed safety as well as feed responsibility.

### 3.3.1. Tools for assurance

Within the GMP+ Feed Certification scheme there are many tools for companies available to assure compliance with normative references regarding both feed safety and feed responsibility, for example:

- a. A management system.
- b. A risk assessment system (HACCP).
- c. A prerequisite program.
- d. Process requirements.
- e. GMP+ support products (such as the FSP with generic risk assessments).

### 3.3.2. Certification

As important as the requirements for the companies assuring feed safety and/or feed responsibility are, are also the requirements for certification bodies about auditing and certifying these companies. Within the GMP+ Feed Certification scheme the following certification requirements (rules of certification) are laid down:

- a. Strict acceptance requirements for both certification bodies and auditors.
- b. Obligatory harmonization meetings and examinations to keep the knowledge of auditors concerning GMP+ requirements up-to-date.
- c. Fixed audit times.
- d. Checklists.
- e. Supervision of the certification process carried out by certification bodies (compliance audits).

## 3.4. Experienced scheme manager

GMP+ International has developed the GMP+ Feed Certification scheme from a small national initiative to currently over 12,900 certified companies all over the world in all links of the feed chain. With participation of (inter)national partner organizations, GMP+ International is able to present the market with a certification scheme that suits the need of the market. This makes the GMP+ Feed Certification scheme a well-accepted certification scheme and in many countries and markets even a license to sell. The experience as a scheme manager makes GMP+ International a trustworthy partner also to implement new market requirements into the GMP+ Feed Certification scheme successfully.

## 3.5. Feed Support Products

GMP+ International provides various support products to GMP+ participants, such as:

- a. Generic risk assessments of feed materials.
- b. Fact sheets about undesirable substances and processing aids.
- c. GMP+ Monitoring database.
- d. Various documents supporting GMP+ certified companies with implementing GMP+ FC requirements.

GMP+ International is currently working out a request for a new Feed Support Product facilitating self-assessment and sharing company-specific information about sustainability policy. In the future more Feed Support Products can be created to support GMP+ participants with implementing requirements regarding feed safety as well as feed responsibility issues.

## 4. Objective(s)

The **main goal** is to facilitate feed companies which want to demonstrate that they assure the market requirements for responsibly produced feed.

The following **sub goals** are applicable:

- a. One stop shop – multiple certification possibility by including (other) relevant responsibility aspects regarding feed and biomass in GMP+ Feed Certification scheme (GMP+ Feed Responsibility Assurance module)<sup>1</sup>.
- b. Support services regarding developing of and communication about the company-specific responsibility policy.
- c. Stimulation for harmonization of requirements regarding responsible feed production demanded by the different food sectors like livestock farming (poultry, meat, eggs and dairy) as well as aqua culture.

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<sup>1</sup> Combination of different options is not compulsory. That enables companies, certified against another feed safety assurance scheme than a standard of the GMP+ Feed Safety Assurance module, to obtain a GMP+ FRA certificate.

## 5. Strategy

### 5.1. Main strategy

GMP+ International has not the intention to play a leading role in defining the content of the market requirements about feed responsibility, because in the several market segments or regions are different wishes and opinions about feed responsibility.

The basic strategy is to collaborate with other organizations (chain partners, which have taken the initiative to defined the market requirements) upstream (primary production / fishery / mining) as well downstream (livestock farming, aqua culture and food processors).

These organisations will define the responsibility standards and GMP+ International will provide the assurance and certification system (via a GMP+ FRA Framework) via a plug-in approach. A company which participates in the GMP+ FRA standard can demonstrate compliance with the specified market requirements. Where possible, GMP+ International will provide support for production and trade of responsible feed within the framework of the FSP.

### 5.2. GMP+ FRA Framework

Within the GMP+ Feed Responsibility Assurance module, various market initiatives can be facilitated. GMP+ International will create a basic 'GMP+ FRA Framework' in which these market initiatives can be plugged in. This basic framework consists of the following elements:

1. *Feed Responsibility Management System:*
  - Management system requirements
  - Prerequisite program
  - Risk assessment approaches
  - Purchasing requirements
  - A material accounting system in which the GMP+ FRA participant can show how responsible material is handled within their company (using one or more supply chain models).
2. *Certification System:*
  - Third party certification (by approved certification bodies)
  - Qualified auditors
  - Clear rules for audit and certification
  - Supervision (compliance audits) and integrity program.

The several market initiatives of chain partners regarding responsible feed production will be integrated in or linked with ('plugged in') this GMP+ FRA framework and together it will form a full standard with several scopes (Figure 3).



Figure 3: Integration (plug in) of market initiatives in the GMP+ FRA Framework

### 5.3. Market initiatives

GMP+ International can plug in all kinds of market initiatives regarding feed responsibility in the GMP+ FRA Framework. These initiatives should have to meet some basic requirements:

- a. The requirements must be verifiable.
- b. The scope of the certification must be clear. It must be clear what the certificate covers and what not.
- c. The certificates (on the one hand for primary production and on the other hand for livestock farming/aquaculture), which GMP+ FRA will link it selves as an intermediate scheme, must be of sufficient quality and integrity. Clear criteria need to be defined.
- d. The market initiative may not have a negative impact on the image of GMP+ International and/or the GMP+ Feed Certification scheme.
- e. There must be enough interest in the market to make the implementation financially interesting for GMP+ International. There must be a good balance between the costs of implementing the market initiative and the financial returns for operating the scheme.
- f. GMP+ International must reach an agreement with the relevant market initiatives with the rights and obligations of both GMP+ International and the party requesting joint implementation in the GMP+ FRA module (scheme partnership).



## 5.4. Joint defining responsibility requirements

As mentioned before, GMP+ International explicitly chooses for facilitating various market initiatives via providing certification of the feed chain, and will not define what the content of this initiative (in terms of responsibility criteria) will be. This has to do with the fact that there are a lot of different interpretations about the definition of responsibility.

Therefore, GMP+ International leaves the definition of the content of feed responsibility requirements to the market initiatives up to the market. This offers flexibility in collaboration with various market initiatives and prevents endless discussions in order to (try to) harmonize the various definitions and criteria of responsibility.

Although downstream partners will be leading in establishing the requirements regarding responsible feed production, GMP+ International wants to be involved in defining the market requirements for two reasons:

- a. to link the market initiatives with the feed chain (getting that chain involved, too), and
- b. to facilitating harmonization of responsible feed requirements over the several market initiatives.

For that reason, GMP+ International establishes a **Subcommittee Responsible Feed** with participation of all stakeholders in the feed chain as well as downstream scheme partners. On ad-hoc basis, depending on the needs on a certain moment, this Subcommittee will be assisted technical working groups (TWG), focussed on various subsectors. Think of TWG's for Livestock / aqua feed manufacturing, Vegetable ingredients, Animal derived ingredients, Marine ingredients or Micro ingredients

In this way, GMP+ International wants to offer the downstream partners an international feed platform and will facilitate the involvement of all relevant stakeholders of the feed chain in defining the responsible feed requirements.

## 5.5. Connecting links in the chain

The GMP+ Feed Certification scheme covers a certain part of the feed chain, starting with companies, right after the primary production up to (compound) feed companies delivering feed to livestock / aquatic farmers.

This gives the GMP+ Feed Certification scheme a unique position to be to bridge between responsible certification schemes for primary production on the one hand, and for livestock farming/aquaculture on the other hand. By defining clear (purchase) requirements, the GMP+ Feed Certification scheme can assure the desired connection between those primary production schemes and livestock farming / aqua culture schemes.

Figure 4 demonstrates an example on how this connection can be made.

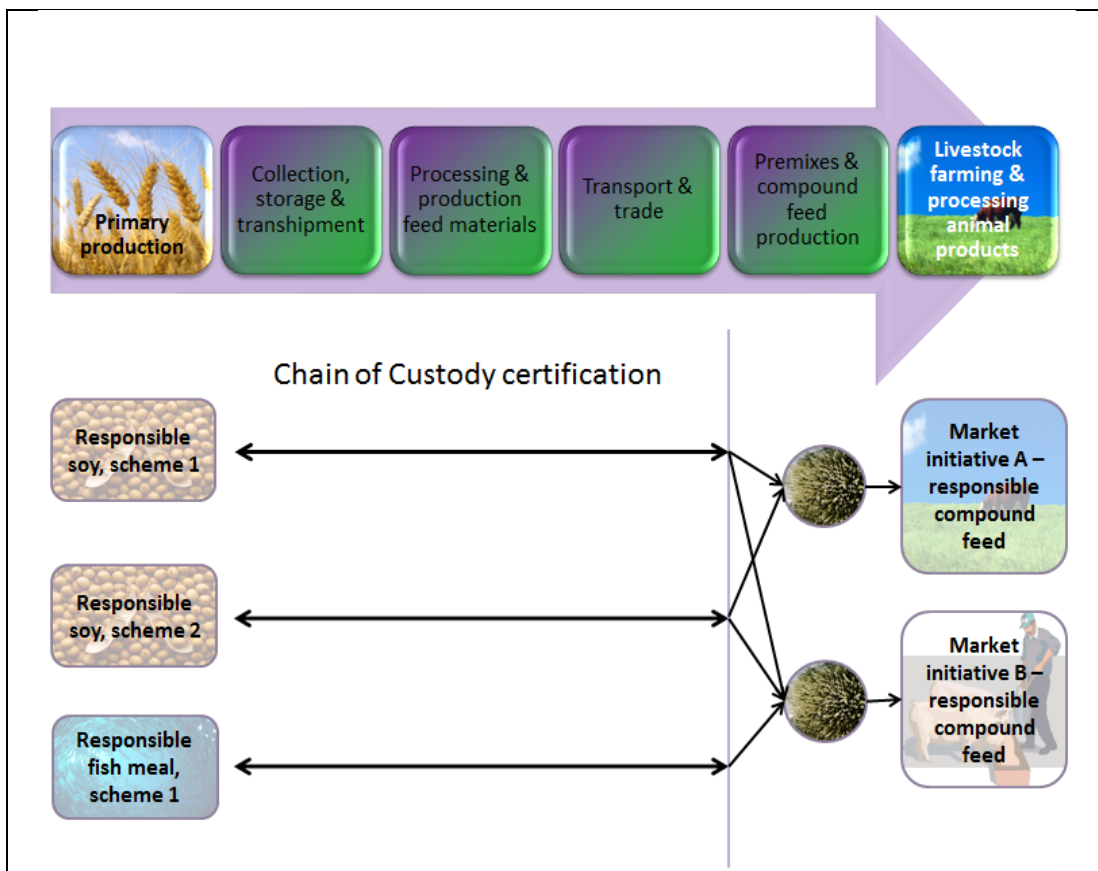


Figure 4: Connecting links in the feed & food chain (example)

Via GMP+ FRA certification, the link could be made between market initiatives along the food chain and the initiatives in the primary production.

Firstly, the GMP+ FRA Framework standard will be available for the chain of custody regarding responsible feed ingredients, linking the primary production and the compound feed production for livestock farming and aqua culture.

Secondly, the GMP+ FRA framework standard will be available for the production of compound feed for livestock farming and aqua culture will link the supply chain of responsible feed ingredients with the specific market initiatives for livestock farming and aqua culture.

## 5.6. Possibilities for multilevel certification

Within responsibility assurance, there is a need for stimulating companies to more and more responsible operation. It is impossible to go from 'normal operation' into fully responsible operation in one step. Due to (for example) the current situation, finances or cultural aspects it could be that the step to get fully GMP+ FRA certified is too big. It is beneficial to allow companies to start at a lower level and grow into full certification. To provide a stepwise growth, a uniform multilevel certification

option could be integrated, in order to include also companies that start with working more responsible

The GMP+ FRA framework standard could provide the option of a uniform multilevel certification approach regarding a normative reference. This is, of course, dependent on the interest of the market initiative to allow such a multilevel certification.

As GMP+ FSA certified companies are the main target group of GMP+ FRA certification, the multilevel certification will not apply to the Feed Responsibility Management System. The implementation of the Feed Responsibility Management System is merely an adaptation / expansion of the Feed Safety Management System which GMP+ FSA certificated companies already have implemented.

The levels can be created by defining clear milestones (in terms of time periods) for compliance with parts of the market initiative, until in the end full compliance is reached.

### 5.7. Additional services

Besides facilitating regarding feed responsibility certification, GMP+ International is willing to provide services to feed companies regarding feed responsibility issues, when there is a real need.

## 6. Plan of action

After publication of this policy document, GMP+ International will take the following steps and provide the following deliverables on short term:

1. Establishing a Subcommittee Responsible Feed (and technical working groups) which will advise the International Expert Committee about implementing market initiatives via the GMP+ FRA Framework (September 2014).
2. Creating a draft of a basic GMP+ FRA framework standard for facilitating certification of market initiatives The market initiatives regarding responsible feed production can be linked to this framework (September 2014).
3. Drafting a collaboration agreement with market initiatives in order to link their initiatives with the GMP+ FRA standards (September 2014).
4. Defining and launching a communication plan to interest other market partners in the food chain to integrate their initiative into GMP+ FRA certification (October 2014).
5. Final decision of the GMP+ FRA framework standard and the first plugged-in market initiatives by the International Expert Committee
6. Implementing the first GMP+ FRA Framework and plugged-in market initiatives (January 2015 onwards).

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