THE PRODUCTION AND DELIVERY OF COMPOUND FEED MAKING USE OF CERTIFIED SOCIALLY RESPONSIBLE SOY



SPECIFICATIONS

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1 GENERAL PRINCIPLES, OBJECTIVES AND FIELD OF APPLICATION

The Belgian Compound Feed Industry has already made great efforts in the field of the production of environment-friendly compound feed. In 1995, a Convention was signed with the Federal Ministry of Agriculture for the production of compound feed with a low content of phosphorus. In 2007, this Convention was replaced by the "Convention for the production of compound feed with a low content of nutrients", to promote not only the production of compound feed with a low content of phosphorus but also the production of compound feed with a low content of protein.

In 2006, a Group of Belgian stakeholders, under the supervision of BEMEFA, has decided to create the Platform of 'Responsible Animal Feed' (RAFF). The Platform has three objectives:

- to elaborate a standard for Responsible animal feed 1.
- 2. to promote the local (European) sources of proteins
- 3. to diversify the use of proteins

The first mission, the elaboration of a standard for Responsible animal feed, consists of gradually implementing social responsibility criteria, which animal feed must fulfill. The first project that has been developed, is related to soy; the result of this is the present document (specifications). Those specifications will be applicable if the transition from a collective purchase of socially responsible soy to an individual purchase per animal feed producer is made. Thus far BEMEFA has made the negotiations for the purchase of socially responsible soy collective.

The objective is to strongly develop a purchasing policy for socially responsible and environmentfriendly soy. In the future, the focus will be on the socially responsible nature of the incoming soy. The European compound feed industry has decided to fully support the Round Table of Responsible Soy (RTRS: www.responsiblesoy.org). This international Round Table with participants from different interest groups (soy producers, trade, industry/bank, NGO/science) has the objective to define the criteria & principles and indicators for "responsible soy". These indicators will subsequently be integrated in a "standard", to which the soy producers can become certified. A "code of good conduct" will also be established for the other links in the chain.

The initiative to develop new specifications should be placed in an international context. The competitiveness and the competitive position of the animal production has also to be seen in an international context.

The commercialization of soy will first of all be based on the international "Mass Balance based on Volume "-principle, which means that yearly a certain quantity of a specific feed material, in this case certified socially responsible soy, is purchased and used for the production of compound feed without segregation from the moment of purchase until the moment of utilization. This means that the socially responsible soy is purchased to be used for the production of compound feed. For a description of the term "soy": cf. "definitions".

The agreed, yearly revisable, initial quantity is divided among the participants to these Specifications. All members of BEMEFA do apply these specifications since the general assembly of BEMEFA in 2011. BEMEFA purchased 100 000 tonnes of socially responsible soy in 2010, 150 000 tonnes in 2011 and 250 000 tonnes in 2012. For 2013, we predict to purchase 350 000 tonnes of socially responsible soy. The volume will increase till 600 000 tonnes in 2015.

The specified targeted quantity of socially responsible soy for every individual manufacturer can be monitored through the declaration of purchased socially responsible soy to be sent to BEMEFA



by the manufacturer. This targeted quantity will be evaluated on a yearly basis by the GMPauditor, taking also into account the sales of soy.

During an annual audit (combined with GMP audit), the soy purchases will be inspected for at least the following parameters :

- incoming invoices (each attested company keeps a register of soy purchases, making a distinction between not socially responsible soy and socially responsible soy).
- With respect to the sales of soy: these are also inspected during the annual audit making use of the outgoing invoices, where also a distinction is made between not socially responsible soy and socially responsible soy

The attested companies, that comply with these Specifications, send a yearly report to BEMEFA of their sold and purchased soy (making a distinction between not socially responsible soy and socially responsible soy). The report has to be sent to BEMEFA in the month of January. The certification body, recognized by BEMEFA, will control if this report has been sent.

The audits (audit frequency: 1 every year) will be conducted by certification bodies which are recognized by OVOCOM vzw to certify the GMP with the scope "compound feed production" and which have signed an agreement with BEMEFA with respect to the Specifications "for the production and delivery of compound feed making use of certified socially responsible soy".

The attests are valid for 1 year and will be delivered by the certification bodies, recognized by BEMEFA. BEMEFA receives a copy of the attest and publishes a regularly actualized list of attested companies on her website. Companies with attests expired for more than one month will be removed from the list.

BEMEFA will create an Advisory Committee composed of 4 representatives of BEMEFA and representatives of the Retail Sector, the Processing Industry, the labels,.... The Advisory Committee, in charge of the evaluation of the Specifications, meets once a year. The committee also evaluates the MASS balance volume- figures (globally and for each individual participant) and proposes new figures for the next coming soy harvest year (June-May).

For new participants (compound feed manufacturers) who have not been using socially responsible soy in the previous calendar year, a targeted quantity to be purchased will be estimated, based on the declared quantities (cf. declaration form sent to BEMEFA). The targeted quantities for the rest of the year where the notification was done will be reviewed depending on the results of the first GMP-audit. New participants will have their names published on the online "list of participants" upon receipt of a written notification of participation by BEMEFA. The name of the participant is accompanied by the mention "NOTIFIED on DD/MM/YYYY". The specification 'NOTIFIED on DD/MM/YYYY' will remain on the list for a maximum period of 12 months (12 months is the maximum period length between 2 audits).

The compound feed manufacturers, complying with the Specifications, can be attested as a "producer of compound feed making use of socially responsible soy" by the certification body.

1.1 OBJECTIVES



The purpose of these Specifications is to describe the procedure to be followed by the compound feed production-units where socially responsible soy is being used. The main objective of these specifications is to promote the import of socially responsible soy for feed production.

1.2 FIELDS OF APPLICATION

This procedure is applicable in the compound feed production-units making use of socially responsible soy.

2 **DEFINITIONS**

- feed materials: the "negative list" of feed materials not authorized in compound feed production, is established by the Belgian Royal Decree of 8/02/1999 laying down the conditions for the placing on the market and use of feed.
- Batch: Identifiable quantity of feed determined to have common characteristics.
- Soy: fullfat soybeans, soybean meal
- GMP: "Good Manufacturing Practice" for the trade, manufacturing, storage and delivery of animal feed, developed by OVOCOM vzw Belgium (the Concertation Platform of the Feed Sector) (including interchangeability with foreign quality systems).
- Certification body: accredited by Belac (Belgian Accreditation Body) for the certification of the GMP and of the self control guide for the animal feed sector (validated by the FASFC), the scope of certification covering the "manufacturing of compound feed". The certification body has to be recognized by BEMEFA vzw to control the compliance with these Specifications. BEMEFA vzw defines the modalities for recognition.
- Socially responsible soy: soy which is complying with a number of principles/ criteria and indicators for "responsible soy" production, according to the "RTRS standard". The period till 2015 will be considered as a transition period, in which certificates can be issued, based on a certain number of "durability criteria". The list of "durability criteria" has been added in attachment to these specifications. BEMEFA makes a list of the recognized certification systems.

3 **GENERAL REQUIREMENTS**

- The compound feed manufacturing company has to work accordingly to the documented and certified quality system established by OVOCOM vzw. Similar quality systems can also be accepted, according to conditions specified by BEMEFA vzw.
- The quality system must comply at least with the requirements of the GMP that are applicable for the company: trade and manufacturing of compound feed; trade and manufacturing of premixtures, trade and manufacturing of feed materials, trade of feed materials, storage and delivery of feed materials, transport of feed materials, premixtures and compound feed.



All concerned employees possess sufficient knowledge on the production system where socially responsible soy is used. They are capable of performing corrective interventions if necessary.

PURCHASE REQUIREMENTS FOR SOY

4.1 DEFINITION SOCIALLY RESPONSIBLE SOY

- There are 2 types of soy: the 'not socially responsible soy' and the 'socially responsible soy' (certified)
- The principles/ criteria and indicators for the socially responsible soy (certified) are described in these Specifications (see annex).

4.2 PURCHASE OF CERTIFIED SOCIALLY RESPONSIBLE SOY

- The "socially responsible soy" has to be certified. Every purchased batch must be sampled
- The specifications for "the production and delivery of compound feed making use of certified socially responsible soy" are kept at the disposal of the auditor
- Every supplier of socially responsible soy will be evaluated. All purchase documents are kept at the disposal of the auditor.

4.3 PURCHASE REGISTRATIONS

- With respect to traceability, all purchases of socially responsible soy must be registered and kept.
- Suppliers of socially responsible soy are evaluated every year in order to assure their compliance with the GMP and the certification
- Purchase invoices of soy are registered in a dedicated register. A distinction is clearly made between 'not socially responsible soy' and the 'socially responsible soy' (certified).

5 TRANSPORT REQUIREMENTS FOR SOY

- If an external company is taking care of the soy transport, this transport company must be GMP certified and comply with the requirements with respect to the cleanness of the vehicle.
- If the company takes care itself of the soy transport, transportation must be integrated into their own certified quality system.

RECEIPT REQUIREMENTS FOR SOY

- Procedures for the receipt and sampling of soy must be available.
- A representative sample from each incoming batch is taken. The samples are packed and labeled so that they can be clearly identified. The samples are stored and kept in a suitable room during at least 6 months.



7 STORAGE AND TRANSFORMATION REQUIREMENTS FOR SOY

Before being used, the soy is stored in an designated and appropriate storage place (e.g. silo...).

- The distributor/producer must know the procedures regarding storage and uilization of soy
- For each batch of compound feed that has been produced, the feed manufacturer must be
 able to track quickly which batches have been incorporated into it. On the other hand, it
 must be possible to find out quickly in which batches of compound feed, a certain batch
 has been mixed.

8 MANUFACTURING REQUIREMENTS FOR COMPOUND FEED

- Samples must be taken from each batch of compound feed. The samples must be labeled so that they can be clearly identified. The samples are kept for at least 3 months in a suitable storage room. Registers are kept.
- The number of analysis within the self check system are the analysis conducted by the
 compound feed producer for his self check system. BEMEFA has developed a sampling
 plan at the sector level. The plan covers all type of contaminants (in feed materials,
 premixtures and compound feed), all residues of coccidiostatics (in compound feed),
 registered medicated feed, Zn amounts in feed for prok or sampling for export.
- The certification body also takes samples as a control on the self check. These samples are taken by a ISO 17020 certified body and analysis are carried out by accredited laboratories (17025).

9 DELIVERY REQUIREMENTS FOR COMPOUND FEED

• If the company takes care itself of the transport, transportation must be integrated into the certified quality system implemented by the company and comply with the GMP requirements regarding transport (cf. www.ovocom.be)

10 RETURN FLOWS

There is a need for procedures that describe a documented program for the handling of non-conforming products.

The program must contain:

- information on interested parties e.g. contact persons in case of emergencies
- identification and location of suspected products
- identification and notification of customers
- recall of the suspected product
- treatment of the recalled product
- internal investigation to the possible origin of the problem followed by corrective measures
- annual evaluation of the efficiency of the procedure

In this context, reference can be made to the crisis scenario manual, elaborated by BEMEFA.

All actions undertaken in the context of this program, should be listed and kept in an appropriate



register.

11 CONTROL OF NON CONFORMING PRODUCT PROCESS

- The manufacturer has written down procedures on how to deal with non conforming products.
- This handling of Non conforming products foresees an identified, a documentation, an evaluation, a segregation (if workable practically) and an action (recuperation and treatment of non-conform products).
- The manufacturer will implement corrective measures when a production of non conforming products has occurred. These corrective measures must be registered and need also to be evaluated in terms of efficiency.

12 CONTROL OF THE REGISTERS

The inspection and control reports, the registers of the purchased feed materials in general and of soy in particular, the registers of the compound feed productions must be kept available for consultation for at least 2 years.

13 CONTROL OF THE SELF CONTROL

The FASFC is authorized to take the samples needed in the control of the self control system.

14 INTERNAL AUDITS

- The company has established a documented system of internal audits in order to control the compliance with these Specifications. Such audit has to be organized and conducted at least once a year.
- The compound feed formula must be kept for the period required by law and must be kept available for the certification body in the production unit/head office.
- The audit reports are registered and presented to all personnel that has certain responsibilities in the area(s) covered by the audit.
- Measures need to be implemented to correct, improve or prevent the deficiencies that have been identified during the audit.
- The implementation and the efficiency of the implemented measures will be evaluated and registered.

15 TRAINING



- The personnel is expected to have the knowledge and skills necessary to accomplish the tasks assigned to them with respect to the compound feed manufacturing in general and with the applications decribed under these specifications in particular.
- Work experience, skills and (required) training of each concerned employee is registered.

16 COMPLIANCE WITH LEGAL REQUIREMENTS

The manufacturer/distributor must comply with the existing Belgian and European regulations (legislation), the self-control guide for the animal feed sector and respect the GMP requirements. It is important that the manufacturer/distributor is aware of all the recent changes. The coordinated legislation can be consulted on the website of BEMEFA: www.BEMEFA.be

17 REQUIREMENTS FOR CONTROL AND CERTIFICATION

- The certification body, in charge of the attestation with respect to these Specifications must be recognized by BEMEFA vzw. The list of the recognized certification bodies is published on the website of BEMEFA (www.BEMEFA.be)
- The auditors, in charge of the attestation of these Specifications, need to follow a training course. This training is organized by BEMEFA. The auditors having followed the course, will receive a certificate of attendance. The names of the auditors are also published on the website of BEMEFA (www.BEMEFA.be).
- The manufacturer/distributor is committed to give the necessary information to the certification body and to collaborate during their control activities.
- The audit is a combined audit, conducted simultaneously with the GMP audit. (www.ovocom.be).

18 LABELLING REQUIREMENTS

The feed materials used in compound feed are indicated on the label in accordance with the legislation



ANNEX 1: LIST OF "SOCIALLY RESPONSIBLE CRITERIA".

- 1) Legal compliance and Good Business Practice
 - a) Compliance with local and national laws
 - i) Producer can demonstrate awareness of his or her responsibilities, according to applicable laws
 - ii) Applicable laws are being complied with
 - b) Legal use rights to the land, clearly defined and demonstrable
 - i) Documented evidence of rights to use the land
- 2) Responsible labour conditions
 - a) No engagement in or support child labour or forced labour or engage in or support discrimination or harassment
- 3) Environmental responsibility
 - a) Soybeans produced in the area of the Amazone Biome deforested after July 24, 2006 will not be accepted
 - b) No conversion of native vegetation has occurred after may 2009
- 4) Good agricultural practices
 - All application of chemicals agrochemicals is documented and all handling, storage, collection and disposal of chemical waste and empty containers, is monitored to ensure compliance with good practice
 - b) Agrochemicals listed in the Stockholm and Rotterdam Conventions by the PAN (Pesticide Action Network) Dirty Dozen are eliminated
 - c) Origin of seeds is controlled to improve production and prevent introduction of new diseases :
 - i) all purchased seed must come from known legal quality sources
 - ii) self-propagated seeds may be used, provided appropriate seed production norms are followed and legal requirements regarding intellectual property rights are met



ANNEX 2: LIST OF CERTIFICATION SYSTEMS REGOGNIZED WITH RESPECT TO THE "SOCIALLY RESPONSIBLE SOY"

- CEFETRA/ Vanden Avenne Izegem : Control Union Certification : assessment form and inspection report on RTRS, version xx , April 2009
- Amaggi Protocol for the Responsible Production of Soybeans: SGS, version 11/12/2008



ANNEX 3: PUCHASE REGISTER OF SOCIALLY RESPONSIBLE SOY

(under construction)



ANNEX 4: AUDIT AND AUDIT FREQUENCY

(Under construction)