ANNEX 04, Version 03

Risk-based Europe Soya Inspection System

The Europe Soya inspection system is risk-based. Different risk categories are applied to determine the respective production area risk level (F-RL) for agricultural producers (farmers) and the individual risk for all other certified companies in the supply chain. The risk-based inspection system is applicable to soya beans and other arable crops (see Annex 6).

The risk categories shall be used to determine:

- the frequency of inspections and supervisory inspections by an independent third party (i.e. an independent certification body);
- the frequency of supervisory inspections by Donau Soja Organisation;
- the applicability of certain additional quality assurance requirements (e.g. GMO analysis, pesticide analysis).

1 Risk assessment for individual farmers or farmer groups

1.1 Risk categories

At the level of the agricultural producer (farmer), the following five risk categories **(a-e)** shall be defined:

(a) Contamination with GMO: Refers to the risk that Europe Soya arable crops are contaminated with genetically modified material. This risk is based on the GMO situation in the respective producing country.

(b) Geographical origin: Refers to the risk that the produce does not originate, or does not originate 100%, from the Europe Soya region. This risk is based on the geographical origin of the Europe Soya arable crops. Countries represented with regions (only one or more parts of a country are located within the Europe Soya region) carry a higher risk.

(c) Pesticide use and desiccation practices: Refers to risks related to the use of pesticides, considering the legal framework, the national list of approved substances and the national situation with regard to desiccation practices. This risk is based on an assessment of national sectoral legislation compared to EU legislation and other relevant documents (e.g. WHO Recommended Classification of Pesticides by Hazard[1]).

(d) Legal compliance: Refers to the risk that farmers do not comply with applicable legislation. This risk is based on 1) the Worldwide Governance Indicators[2] by the World Bank and 2) the Country Legal Compliance Assessment[3] published by the SAI Platform.

(e) Land conversion and arable crop production in protected areas: Refers to the risk that non-agricultural land was converted to cropland after 1st January 2008. This risk is based on 1) a land use change assessment for the relevant country in line with the PAS 2050-1 methodology[4] and 2) additional data sources where applicable (e.g. satellite assessment, literature review).

[1] The WHO Recommended Classification of Pesticides by Hazard, WHO, accessible online at: https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1

[2] Worldwide Governance Indicators, World Bank, accessible online at: https://databank.worldbank.org/source/worldwide-governance-indicators

[3] Country Legal Compliance Assessment, SAI Platform, accessible online at: https://saiplatform.org/wp-content/uploads/2019/03/pr_country_legal_compliance_assessment_03.11.2019.pdf

[4] Direct Land Use Change Assessment; Blonk Consultants, accessible online at: https://www.blonkconsultants.nl/portfolio-item/direct-land-use-change-assessment-tool/?lang=en

1.2 Risk matrix

The risk assessment shall consider the risk categories of **a-e**; the risk shall be assessed per country and shall be summarised as "production area risk level" (**F-RL**).

Country	GVO-RL	ORIGIN-RL	PESTICIDE-RL	LUC-RL	LEGAL-RL	F-RL
Bulgaria	1	1	1	1	2	1
Germany	1	1	1	1	1	0
France	1	1	1	2	1	1
Greece	1	1	1	1	2	1
Italy	1	1	1	1	2	1
Croatia	1	1	1	1	2	1
Netherlands	1	1	1	-	1	0
Austria	1	1	1	1	1	0
Poland	1	1	2	1	1	1
Romania	2	1	1	1	2	2
Slovakia	2	1	1	1	1	1
Slovenia	1	1	1	1	1	0
Spain	2	1	1	1	1	1
Czech Republic	2	1	1	1	1	1
Hungary	1	1	1	1	1	0
Bosnia and Herzegovina	1	1	2	2	2	2
Moldova	**3**	1	2	1	2	3
Russian Federation	1	2	2	1	2	2
Serbia	1	1	1	1	2	1
Switzerland	1	1	1	1	1	0
Ukraine	**3**	1	2	1	2	3

1.3 Inspection frequencies for individual farmers or farmer groups

The risk assessment based on the risk categories of **a-e** shall determine the frequency of inspections to be conducted by a certification body recognised by Donau Soja Organisation. For farmers or farmer groups, inspections shall be conducted at least every three years, except for farmers with an F-RL of 0 or 1 who participate in a certification system that can, upon application, be recognised as equivalent by Donau Soja. Farmers located in production areas with the highest GMO risk shall be individually certified and be subject to annual inspections.

Company type	**Risk level**	**Inspection frequency**
Agricultural producer (farmer)	F-RL 0	Inspection every 3 years
	F-RL 1	Inspection every 2 years
	F-RL 2	Annual inspection
	F-RL 3	Annual inspection

Satellite image-supported verification of freedom from land conversion is conducted based on risk as part of the integrity programme.

2 Risk assessment for certified companies in the supply chain

2.1 Risk categories

For certified companies other than farmers in the supply chain (e.g. collectors, traders, processors, compound feed producers, marketers), the risk of GM contamination shall be taken into account.

2.2 Risk Matrix

The risk assessment shall consider the risk of contamination of Europe Soya-certified arable crops or derived products with GMOs. The risk shall be assessed for each company and shall be assigned a **company risk level** (see R 02 to R 06b, paragraph 1, for the risk levels of agricultural collectors and primary collectors [C-RL], traders [T-RL], primary processors [P-RL] and agricultural processors [A-RL]).

Company type	**Risk level**	**Definition**
Agricultural collector & primary collector; trader; primary processor	RL 0	Only Europe Soya arable crops are stored, traded or processed.
	RL 1	Only GM-free arable crops are stored, traded or processed; non-GM arable crops of origins other than Europe Soya may also be stored, traded or processed.
	RL 2	Only GM-free arable crops are stored, traded or processed (e.g. soya, rapeseed); GM crops of another type (e.g. maize) may also be stored or processed.
	RL 3	GM arable crops and GM processed products (e.g. meal) may also be stored, traded or processed.*

*Only possible for oil mills and toasters if the processing lines are 100% segregated, both physically and technically; not possible for food producers

Company type	**Risk level**	**Definition**
Agricultural processor (animal keeper)	RL 0	Europe Soya single or compound feed only
	RL 1	Also other non-GM single or compound feed (non-GM is documented)
	RL 2	Also GM single or compound feed, but only in another farm activity (e.g. certified laying hen feed & conventional fattening pig feed); no GM feed or raw materials in the same facilities
	RL 3	Also GM single or compound feed in the same facilities, but only if appropriate measures to minimise the GM contamination risk are in place

2.3 Inspection frequencies for certified companies in the supply chain

The assessment of the risk of GM contamination shall determine the frequency of inspections to be conducted by independent third parties (i.e. independent certification bodies). Inspections at the level of compound feed producers and food processors shall be conducted in accordance with the standards for non-GM inspections.

Company type	**Risk level**	**Inspection frequency**
Agricultural collector & primary collector	C-RL 0	Inspection every 2 years
	C-RL 1	Inspection every 2 years
	C-RL 2	Inspection every 2 years
	C-RL 3	Annual inspection
Trader	T-RL 0	Inspection every 2 years
	T-RL 1	Inspection every 2 years
	T-RL 2	n.a.
	T-RL 3	Annual inspection
Primary processor	P-RL 0	Annual inspection
	P-RL 1	Annual inspection
	P-RL 2	Inspection twice a year (once unannounced)
	P-RL 3	Inspection twice a year (once unannounced)
Compound feed producer	n.a.	Conducted in combination with non-GM inspections, at least once a year
Agricultural processor (animal keeper)	A-RL 0	Inspection every 2 years
	A-RL 1	Inspection every 2 years
	A-RL 2	Inspection every 2 years
	A-RL 3	Annual inspection
Food processor through marketer	n.a.	Conducted in combination with non-GM inspections, at least once a year