

REQUIREMENTS 06a, Version 04

Agricultural Processor

Purpose	Specify the Europe Soya requirements to be met by agricultural processors (animal keepers).
Definition	<p>Agricultural processor: Company or agricultural holding engaged in animal husbandry and feeding soya-containing single or compound feed to their animals (e.g. farms, where laying hens, fattening poultry, fattening pigs, beef cattle or dairy cattle are kept.)</p> <p>Non-GM: non-genetically modified GM: genetically modified GMO: genetically modified organism Codex: Guideline on the Definition of "GMO-Free Production" of Food and its Labelling (<i>Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung</i>) published in the Austrian Food Codex (Codex Alimentarius Austriacus)¹ in combination with its Guideline on the Risk-Based Monitoring of GMO-Free Production (<i>Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit</i>)² VLOG: German „Verband Lebensmittel ohne Gentechnik“ (VLOG, www.ohnegentechnik.org) Non-GM Danube Region Standard³</p>
Outline	<p>1 Risk assessment.....1</p> <p>2 Incoming produce with declaration2</p> <p>3 Documentation and record keeping.....2</p> <p>4 Outgoing produce, product labelling3</p> <p>5 Directly commissioned inspections.....4</p> <p>6 Supervisory inspections.....5</p> <p>7 Group certification.....5</p>
Status	Version 04: this version was released by the Board on 20.02.2025

1 Risk assessment

1.1 Presence of GM animal feed

The animal keeper shall be assigned an “animal keeper risk level” (= A-RL) based on the qualities of the soya delivered to the company and stored and fed to the animals there:

- A-RL 0: Europe Soya soya single or compound feed only;
- A-RL: 1: also other non-GM soya single or compound feed (non-GM is documented);

¹ Reference for the *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of GMO-Free Production of Food and its Labelling) in the Austrian Food Codex, IV edition: https://www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn

² Reference for the *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production): www.bmfwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf

³ Reference for the Non-GM Danube Region Standard and Inspection Standard: www.donausoja.org/en/downloads



- A-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;
- A-RL 3: also GM single or compound feed in the same facilities, but only if appropriate measures to minimise the GMO contamination risk are taken.

2 Incoming produce with declaration

2.1 Soya-containing animal feed

The type and quantity of single or compound feed, premixtures, additives and (processing) aids purchased and used shall be consistently documented using appropriate accompanying shipping documents (delivery notes, invoices), including the complete and correct quality label "Europe Soya", and shall be open to inspection.

2.2 Animal feed

In compound feed (containing also non-soya components), 100 % of the soya components shall be Europe Soya soya. All feed components shall comply with the non-GM requirements (e.g. maize, rapeseed or premixtures).

A valid Europe Soya certificate from each supplying single or compound feed producer shall be open to inspection.

3 Documentation and record keeping

- 3.1 The number and density of livestock, along with the date of their entry and exit, shall be documented in a way that a plausibility check on the animal feed used (e.g. feed ration per day or per fattening period) can be done immediately and at any time.
- 3.2 A list of animal feed and suppliers as well as a list of customers shall be available and open to inspection.
- 3.3 Internal documentation of animal feed use shall enable a plausibility check to be made on the matching of the Europe Soya quantities used with the quantity of products produced therewith and with the number of livestock.
- 3.4 In case of home feed compounders and mobile blenders at the company: The use of compliant animal feed, premixtures, additives and (processing) aids shall be appropriately documented so that a plausibility check on the animal feed used can be done immediately and at any time.
- 3.5 Animal keepers utilising mobile blenders shall ensure that these blenders have been appropriately cleaned so that they are empty, clean and free of any GMO traces before they come into contact with Europe Soya products.
- 3.6 In case of direct marketers: The animal keeper shall conclude a Europe Soya Licence Contract with Donau Soja Organisation on the requirements to be met.



4 Outgoing produce, product labelling

- 4.1 The quality and quantity of Europe Soya produce as well as their buyers shall be precisely documented in the outgoing produce department.
- 4.2 The produce itself (packaging) as well as the accompanying shipping documents (delivery notes, invoices) shall bear a mark stating "fed with Europe Soya".
- 4.3 Minimum percentages of soya

The product name "fed with Europe Soya" may only be used if the following two criteria are met:

- In products that consist of soya, contain soya (components) or were produced using soya beans as animal feed (incl. soya components such as oil added to the animal feed), the total amount of soya has to be Europe Soya soya.

Exemption: If the availability of individual soya components such as soya lecithin in sufficient quality cannot be ensured by at least two independent providers, other components certified as GM-free may be used on application and with the written consent of the Donau Soja Organisation.

- In the production of animal products, the entire feed ration shall have the following minimum percentages of soya:

Animal species	Minimum percentage of soya
Fattening pigs	5 %
Fattening poultry	10 %
Laying hens	5 %*
Beef cattle	250 g/animal/day
Dairy cows	100 g/animal/day**

* calculated over the entire laying period of a flock

If an egg packing station (working with several egg suppliers) wishes to label their products as "Europe Soya", they have to make sure that at least 80 % of the certified eggs come from laying hens being fed on the aforementioned minimum amount of soya.

** applicable for self-marketers of milk and milk products

If a dairy company (working with several milk suppliers) wishes to label their products as "Europe Soya", they have to make sure that at least 20 % of the milk comes from cows being fed on the aforementioned minimum amount of soya.

Lower minimum percentages of soya will be approved on a case-by-case basis on application and following examination by Donau Soja Organisation.

Home feed compounders shall comply with the required minimum percentage of soya in the feed ration (see table), and the total amount of soya has to be Europe Soya soya. Compliance with these requirements shall be demonstrated by formulations and mixing protocols.

4.4 Conversion periods

Once the conversion of a herd to GM-free feeding in accordance with the Austrian Food Codex, or the requirements of the German *EG-Gentechnik-Durchführungsgesetz* (EC Genetic Engineering Implementation Act), or the Non-GM Danube Region Standard is completed, the product may be marked with the product name "fed with Europe Soya" immediately after the feeding was converted to Europe Soya soya on farms where laying hens or dairy cows are kept and which are converted for the first time.

In all other cases, the same conversion periods as for the "GMO-free" labelling in the Austrian Food Codex Guideline, or in the German *EG-Gentechnik-Durchführungsgesetz* (EC Genetic Engineering Implementation Act), or in the Non-GM Danube Region Standard shall apply to Europe Soya product labelling until a product can be placed on the market.

- 4.5 In case of direct marketers: The animal keeper may label produce delivered to a customer (packaging) as "fed with Europe Soya" provided that all requirements are met.

5 Directly commissioned inspections

- 5.1 The animal keeper shall conclude an inspection contract with a certification body recognised by Donau Soja Organisation, commissioning this body to undertake chargeable inspections at the following frequency:

- animal keepers of all risk levels: first inspection;
- animal keepers of risk levels 0 to 2 (A-RL 0–2): further inspections every two years;
- animal keepers of risk level 3 (A-RL 3): additional inspection once a year.

Whenever possible, Europe Soya audits and certifications shall always be conducted together and in combination with non-GM inspections.

- 5.2 Europe Soya certifications and inspections only relate to those animal species the products of which are designated as "fed with Europe Soya". Other production lines do not need to be subject to the scope of testing provided that there is no risk of Europe Soya soya being mixed with other soya qualities.

Please note: Home feed compounders purchasing soya bean meal, toasted soya beans or other soya components such as soya bean oil are to be considered as farmers. Home feed compounders processing own-harvested or purchased soya beans in a separate facility for the purpose of feeding the livestock on their own holdings, are primary processors according to the Europe Soya Guidelines (see Requirements R 04 for Soya Bean Primary Processors).

- 5.3 If the certified animal keeper suspends or terminates their Europe Soya activity, Donau Soja Organisation may, at the expense of the animal keeper, demand a final inspection by the directly commissioned certification body to verify all conformities from the last audit to the date of termination of the contract. The scope of the final inspection shall be reduced compared to a normal inspection, whereby the exact scope shall be determined by Donau Soja Organisation, if necessary after consultation with the directly commissioned certification body.



6 Supervisory inspections

- 6.1 The company shall accept supervisory inspections (risk-based sampling) by inspection bodies or inspectors commissioned by Donau Soja Organisation.

7 Group certification

- 7.1 Agricultural processors have the option of applying for a group certification under the conditions as set out in the Europe Soya "Requirements for Group Certifications".