STNO

"GMO-free Fed" Technical Platform

Certification Protocol

October 2022

Purpose

Only a production site certified according to OQUALIM's Animal Nutrition Certification Reference (RCNA), or to a reference standard recognised as equivalent by OQUALIM, may request an audit extension for the purpose of validating that it complies with the "GMO-free Feed" Technical Platform (STNO) during the initial audit, monitoring audit or audit renewal. The issuance of the certificate stating that the company's site meets the requirements of the "GMO-free Feed" Technical Platform (STNO) is subject to obtaining the RCNA certificate or the certificate according to the reference standard recognised as equivalent by OQUALIM.

This text concerns the three parties involved in the certification process:

- The certification bodies.
- The companies requesting the certification of their plants.
- The OQUALIM association.

Summary

I. Preamble

I.1. Scope of application

Certification of compliance with the requirements of the STNO may be requested by all **manufacturers, distributors or merchants of compound animal feed (under the regulatory meaning) that undertake to supply breeders with animal feed (feed materials and/or compound feed) not labelled GMO in accordance with Regulation (EC) N°1829/2003 of 22nd September 2003.**

I.2. General principle of the STNO certification

Certification of compliance with the requirements of the STNO is subject to obtaining OQUALIM certification according to the RCNA or certification recognised as equivalent by OQUALIM, certification scope identical to RCNA scope.

If a company has multiple activities that enter into the scope of the STNO certification, the company must request RCNA certification or certification according to a reference standard recognised as equivalent for all these activities, in order to request an STNO extension.

The certification guarantees compliance of the production sites with the STNO requirements. In accordance with the regulations, it is clarified that the company remains responsible for the marketing of its products.

Diagram 1 below summarises the relationship between the 3 parties as part of the RCNA framework that also applies to the STNO.

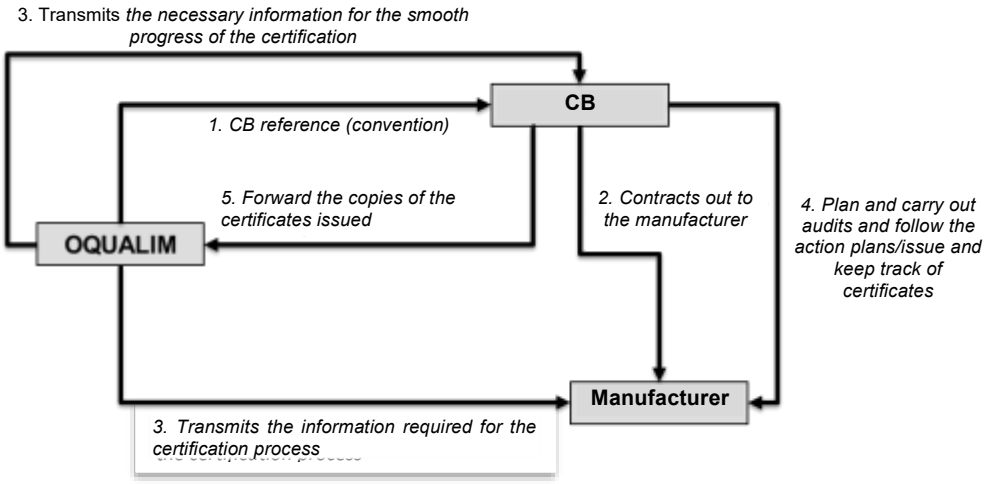

Diagram 1: tripartite relationship

I.3. Commitment by the parties

a) The company's commitment

The company signs a contract with a certification body (CB) referenced by OQUALIM in accordance with chapter III.1 (*see section IV.1 on the company's commitments as part of the contract with the CB*).

Prior to the audit, the manufacturer indicates to the CB that it provides products meeting one or several "GMO-free Feed" specifications and that it wishes to be audited in accordance with STNO requirements.

b) The CB's commitment

The certification body signs an agreement with OQUALIM in which it undertakes to:

- exclusively appoint competent auditors trained in STNO requirements (see chap III.3);
- sign a contract with its candidate customer indicating the STNO certification;
- guarantee the completion of the STNO audits in compliance with this protocol and the indicated requirements.
- Transmit the name of the companies contracting with the CB for the STNO certification to OQUALIM

c) OQUALIM's commitment

OQUALIM undertakes to:

- provide the referenced CBs and candidate companies for certification with all documents required for conducting the STNO audits;
- inform the CBs and manufacturers of any amendments to the system at least 3 months before they enter into application;
- for each CB, keep an updated list of their RCNA reference contact and qualified auditors for auditing the STNO;
- regularly offer qualifying training sessions for auditors, and training sessions for companies;
- guarantee the confidentiality of the transmitted audit reports.

II. Management of the protocol

II.1. Documentary structure

Management of the approach is based on three key documents:

1. The RCNA or reference standard recognised as equivalent by OQUALIM, describing the requirements applicable to the companies involved in the manufacturing of animal feed and the "GMO-free Feed" Technical Platform (STNO);
2. The RCNA certification Protocol describing the conditions under which the compliance certification can by issued, along with this document;
3. The audit check list listing the requirements of the RCNA and STNO to guide the auditor in the compliance assessment.

List of applicable documents:

Titles
Animal Nutrition Certification Reference (RCNA) or a reference standard recognised as equivalent
"GMO-free Feed" Technical Platform (STNO)
RCNA Certification Protocol
STNO supplement to the RCNA certification protocol
RCNA and STNO audit grids

II.2 Diffusion of the documents

All updated documents are available on OQUALIM's internet site:www.oqualim.com

All companies and CBs committed to STNO certification have access to these documents online.

II.3 Revisions and updates

A review of the Protocol and the associated documents may be triggered at any time by OQUALIM, for example due to:

- a major change in the regulatory, normative or economic context;
- the conclusions of the analysis of results of an audit campaign (recurrent non compliance...);
- …

When an amendment takes place, the following version highlights the amendments. Each update is subject to a communication send to the companies and CBs by any means.

III. Requirements with regard to certification bodies

III.1. Initial qualification of the auditors

OQUALIM organises the qualification of the auditors.

To be approved, auditors must meet the requirements below:

- be qualified on OQUALIM "RCNA" certification or the certification recognised as equivalent by OQUALIM;
- have followed the training course organised by OQUALIM: 0.5 days of remote training on STNO requirements and the audit grid.

Each of the requirements above is subject to relevant, stored records in compliance with the provisions stipulated by the CB's procedures.

III.2. Maintaining auditor qualification

To guarantee a satisfactory level of audit relevance, each auditor must comply with the following requirements in order to maintain his/her qualification:

- carry out at least 2 STNO audits per year;
- take part in all knowledge updating training courses.

IV. The certification process

IV.1. Commitment by the companies

The certification body (CB) must ensure that the following elements, as a minimum, are included as requirements in the contract signed between the company and the CB:

- Full collaboration of the company during the audits;
- Communication to the CB of all significant modifications to the product manufacturing process;
- Explicit commitment to comply at all times with the requirements of the STNO and to inform the CB if exceptional circumstances prevent compliance with the STNO;

- When non compliance is noted by the CB, the company undertakes to take the necessary measures within the time period validated by the CB;
- If the STNO certificate is suspended, removed or cancelled, the company is no longer authorised, in whatever way, to refer to this certificate.
- If the RCNA certificate or the certificate recognised as equivalent is suspended, removed or cancelled, the company is no longer authorised, in whatever way, to refer to these certificates (RCNA or certificate recognised as equivalent and STNO).

IV.2. Audit dimensioning and planning

a) Audit frequency

By default, and once the certification has been granted, audits take place on an annual basis. The certification cycle is based on the cycle of the RCNA or certificate recognised as equivalent.

The certificate has the same validity period as the RCNA certificate or the certificate recognised as equivalent, on which it is based.

The audit planning follows the same rules and the same cycle as the audits for the RCNA, or to a reference standard recognised as equivalent by OQUALIM.

b) Scope of the certification

The exclusion of activities present on the site and covered by the scope of certification is not permitted.

c) Duration of audits

Audits may be combined with other types of audits; however sufficient time must be provided by the CB to carry out an in-depth, reliable assessment of compliance with the RCNA and STNO requirements.

In the event of the extension to the scope of certification during a certification cycle, the company will communicate to the CC the type of extension.

The additional duration to carry out the STNO audit is a minimum of 0.25 days per site excluding the reporting time.

IV.3. Conducting audits

a) Programming and conducting the audit

Identical to the rules established for the RCNA.

b) Classification of deviations / Vigilance points

Examples of major and minor deviations and vigilance points are provided in the STNO audit grid.

Major deviation

- non compliance with a regulatory requirement;
- failure to take into account a requirement in the reference standard;
- minor deviation that is repeated from one audit to another.

Minor deviation

- deviation that may have an impact on product quality;

- a requirement in the reference standard that is only partially taken into account, without a direct impact on product quality;
- documentary deviation.

Vigilance points

- areas of concern that may lead to a deviation in a long-term period.

c) Issue and processing of the report

In addition to the documentary supports provided by the CB, the audit report must contain the following content:

- The completed STNO check-list: each item must be subject to a written observation of compliance or non-compliance ("compliance Y/N" and "auditor observation" columns completed). If a non-compliance (major or minor) is issued, the compliance observation is "N" and the non-compliance indication is reported into the "observation" column.
- The action plan monitoring support from the audit grid.

The CB will transmit the audit report to OQUALIM.

IV.4. Monitoring of action plans and sanctions

The consequences of the different levels of observations on the audit result are summarised in the table below:

Type of non compliance observed	*Quantities*	*Consequences*
Major	≥ 1	Communication to the CB of the elements that enable the deviation(s) to be removed within 60 days and before the expiry date of the certificate. Any major deviation that has not been removed blocks the issue of the certificate or suspends it. If the CB considers it necessary, an additional audit may be conducted to check the effectiveness of certain actions.
Minor	≥ 1	Communication of an action plan within 60 days, for which the CB validates the relevance. The effectiveness of this action plan will be checked at the next audit, and the deviation removed if this is the case.

The maximum duration of suspension of an operator may not exceed 4 months before the certificate is removed.

Any suspension, removal or cancellation of the RCNA certificate or equivalent will lead to the suspension, removal or cancellation of the STNO certificate.

A critical nonconformity is issue for example when positive declaration (“fed without GMO<0.9%”) is demonstrably challenged. (Example : a feed material with a GMO label is intentionally introduced in feed with the positive declaration (“fed without GMO<0.9%”)

The certificate is suspended immediately for a 6-month period at maximum.

- The certified site must provide an objective proof to the CB of search on identified causes, related risks and the corrective action plan. The elements must be provided to the CB on the 14-days following

the audit. In the elements are not forwarded within the 14-days period following the audit, the certificate is withdrawn.

- An additional audit must be performed by the CB from 6 weeks to 4 months after the following or renewal audit, where the nonconformity as been issued, to check the closure. The audit is performed on-site (half-day, at a minimum). If the additional audit is successful, the certificate and the audit cycle are re-established and the next audit will be set as planned initially
- The certificate must be withdrawn where the critical nonconformity is not solved effectively during the 4-month period.

When a critical nonconformity is issued during an initial certification audit, a new complete initial audit must be performed after transmitting the elements by the candidate site.

The possibility of comments from the participant regarding the fact justifying such a sanction must be reported in the communication of the sanction to the participant.

IV.5. Management of certificates

Once all non-compliant items have been rectified and the audit report closed, the person responsible for the audit recommends the site for certification. The file is checked and validated in a technical review. The certification body decides the certification.

A certificate is then issued, stating:

- the corporate name of the certified company and its address;
- the scope of the certified activities;
- the concerned site and its address;
- the date of the original certification, which is the date of the first certification decision;
- the expiry date of the certificate;
- the renewal date of the certificate;
- the certificate number.

The CB sends an original certificate to the audited company and provides a copy to OQUALIM.

Certificate templates can be found in Appendix 1.

The CB issues the audited company with a declaration of completion of the monitoring audit and provides a copy to OQUALIM. Declaration templates can be found in Appendix 2.

IV.6. Communication and confidentiality

OQUALIM keeps an updated list of certified companies. This list is published on OQUALIM's internet site for public access: www.oqualim.com

The following information is published for each company:

- the corporate name of the certified company and the list of sites covered by a multi-site certificate if applicable;
- the address of the certified company or the head office in the event of multi-site certification;
- the certified activities;
- the expiry date of the certificate.

OQUALIM guarantees the confidential nature of the information obtained from the CB and the company at all levels of its organisation, within the limits of this protocol. Unless otherwise stipulated in this document, no

confidential information on an CB or determined company may be communicated to a third party without the written authorisation of the CB or concerned company.

If disclosure of information to a third party becomes mandatory, the CB or company is kept informed about the communicated information.

Appendices

- Appendix 1: STNO certificate template
- Appendix 2: STNO declaration template

Appendix 1 – STNO certificate template for manufacturer or distributor of feed

CERTIFICATE

Free area reserved for the identification and logo of the certification body

Attest that, the validation of the OQUALIM RCNA (or certification recognized as equivalent by OQUALIM) audit carried out on…. to, that allowed the issuance of the certificate No., and control of Technical Base «Feed without GMO» (STNO) performed jointly

The company : *Name and location of the company*

For the site located at …..

Meets the requirements of the OQUALIM Technical Base **« Feed without GMO » (STNO)**

OQUALIM certification standard current version

For the activities of producing and placing on the market of [select : *compound feed, mineral feed, liquid feed, milk replacers*] for animals

and where applicable for the processing of feed materials

For the activities of distribution of [select : *Compound feed, mineral feed, liquid feed, milk replacers*] for animals

Possibility to cover the activities below if at least one of the above activities is certified

For the activities of distribution of [**select** : feed materials] for animals

For the activities of trading of [**select** : compound feed, *mineral feed, liquid feed, milk replacers,* feed materials] for animals

This attestation is valid from ../../…. to ../../…. (final date identical to the RCNA certificate)

N° of certificate :

(Its validity can be checked on the website www.oqualim.com)

Delivered in ……

Name and visa of the person in charge for the CB

Appendix 2 - STNO declaration template

Free area reserved for the identification and logo of the certification body

Attest that, monitoring audit performed on (include dates)……,

The company

Name and full address of the company

For the production site located in …..

Meets the requirements
Technical Base « Feed without GMO » (STNO), current version

N° of certificate (*issued following the initial decision*) :

(Its validity can be checked on the website www.oqualim.com)

Delivered in…..
Name and visa of the person in charge for the CB

Free area reserved to CB's contact details and additionnal informations