STNO

Socle Technique

« Nourri sans OGM »

Technical Platform “GMO-free fed”

Certification standard for the manufacture and trade of animal feeds meeting “(<0.9%) GMO-free fed” or “from (< 0.9%) GMO-free fed animals” specifications

Version 10 – 7 November 2024

Applicable from 1st January 2025

Document history

Version	Content	Reasons for revising the standard	Date modified
Version 4	Entire document	Creating the STNO Socle Technique « Nourri sans OGM » Technical Platform "GMO-free fed" in version 3, because it is a complementary to the RCNA standard for feed safety	16/10/2017
Version 5	Section 1.1	Extension of scope to distribution and trading activities	01/10/2019
Version 5	Section 1.2	Adding the definitions of distributor and trader (taken from the RCNA)	01/10/2019
Version 5	Entire document	Extension of existing requirements also applicable to distributors and traders	01/10/2019
Version 5	Partie 2 Sections 2.1, 2.3, 2.3.1	Rewording titles	01/10/2019
Version 5	Sections 2.1.2 and 2 .1.3	Adding details to include requirements applicable to feed materials not physically owned	01/10/2019
Version 5	Section 2.1.6	Adding specific requirements for bulk distributors and compound feed traders	01/10/2019
Version 5	Section 2.2.2	Rewording of the requirement to control cross contamination in the event of coexistence	01/10/2019
Version 5	Sections 2.1.2 and 2.3.3	Adding titles of appendices 1, 2 and 3 mentioned	01/10/2019
Version 5	Section 4.2	Adding section 4.2 Logo for positive declaration	01/10/2019
Version 6	Section 2.2.2	Rewording the requirement and adding details for risk analysis of cross contamination	05/10/2020
Version 7	Section 1.2	Updating the definition of incoming material to include compound feed	08/10/2021
Version 7	Section 2.1.2	Adding details for the performance of the risk analysis for the identification of MPR and MPS in the case of a feed material composed of several ingredients.	08/10/2021
Version 7	Sections 2.2.1, 4.2 and Appendix 3	Rewordings	08/10/2021
Version 7	Section 5 and Appendix 4	Adding section 5 and appendix 4 for incident reporting and associated requirements	08/10/2021
Version 7	Appendix 1	Adding details for the classification of plant feed materials of unknown origin	08/10/2021
Version 8	Section 4.2	Rewording the requirement	06/10/2022
Version 8	Appendix 2	Adding a footnote with regulatory references	06/10/2022
Version 9	Section 1.2	Removal of obsolete RCNA version number references	12/10/2023
Version 9	Section 2.1.2	Adding details to distinguish the requirement from the definition of feed materials extracted from the RCNA and recalled in the section	12/10/2023

Version	Content	Reasons for revising the standard	Date modified
Version 9	Section 2.1.3	Rewording title	12/10/2023
Version 9	Section 2.1.4	Adding details for the performance of analyses on MPR to include the notion of feasibility	12/10/2023
Version 9	Section 2.3.1	Adding details for the Internal analytical monitoring plan for finished products in the case of coexistence. Rewording of the definition of a dedicated site	12/10/2023
Version 9	Section 4.1	Rewording communication requirements and commitment to the customer	12/10/2023
Version 9	Appendix 2	Updating the presentation of appendix 2 for clarification	12/10/2023
Version 10	Sections 1.1 and 2.1.5	Adding a clarification on the requirement for the OQUALIM pooled self-monitoring plan corresponding to its main activity, if one exists, or sector plan for sites located in Belgium.	07/11/2024
Version 10	Section 3	Rewording the paragraph. Specification of the expected requirement and annotation at the bottom of the page to help reading.	07/11/2024
Version 10	Section 3.1	Adding a clarification for laboratory requirements	07/11/2024
Version 10	Sections 1.1 and 4.2	Adding a clarification for client requests	07/11/2024
Version 10	Appendix 2	Update of the appendix	07/11/2024

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General elements

1.1 Scope of certification

Decree No. 2012-128 of 30 January 2012 on the labelling of foodstuffs from qualified sectors "without genetically modified organisms" allows agri-food operators to value from consumers foodstuffs from qualified sectors "without GMO ". Regarding animal products, the rules for the use of the following two mentions are detailed in this decree:

- *The statement: "(< 0.9%) GMO-free fed" is reserved for unprocessed livestock ingredients in the meaning Regulation of 29th April 2004 on the hygiene of foodstuffs, except for eggs and milk from animals fed exclusively with feed not subject to the labelling obligations of amended Regulation (EC) No 1829/2003 of 22 September 2003 on genetically modified food and feed.*
- *The statement: "from (< 0.9%) GMO-free fed animals" is reserved for processed livestock ingredients in the meaning of the Regulation of 29 April 2004 on the hygiene of foodstuffs, for eggs and for milk from livestock fed exclusively with feed not subject to the labelling requirements of amended Regulation (EC) No 1829/2003 of 22nd September 2003 on genetically modified food and feed.*

This certification standard applies to the manufacturer, distributor or merchant of compound feedingstuffs (in the regulatory sense) who undertakes to provide livestock breeders requiring STNO certification who order them feed (feed materialsand / or compound feed) not labelled GMO in accordance with Regulation (EC) No 1829/2003 of 22nd September 2003. It provides a technical and professional response to animal nutrition operators wishing toengage in a "GMO-free" process as provided for in Decree No 2012-128.

The audit for the STNO certification is a complementary audit to the OQUALIM RCNA "Certification Standard Animal Nutrition" audit relating to the health safety and quality of feed, or certification standard recognized as equivalent by OQUALIM.

The STNO certification is based on three types of obligation to which the feed manufacturers, distributors and merchants commit:

- **Supply of feed materials guaranteed ≤ 0.9% GMO.**
- **The introduction of means in the factory to bring cross-contamination to a technically unavoidable level.**
- **Analytical monitoring of manufactured feed.**

The RCNA requirements with a direct impact on the control of GMOs are explicitly included in this document.

Participants and candidates for STNO certification must be registered and participates **in the STNO plan and,** if one exists, **in the OQUALIM pooled self-monitoring plan for feed safety** corresponding to their main activity, or sector plan for sites located in Belgium.

1.2 Terms and definitions

At-risk Feed Materials (MPR): guaranteed feed materials ≤ 0.9% of GMOs for which there are GMO varieties authorized for distribution in the European Union, and from production areas where these GMO varieties are authorized for cultivation.

Distributor: physical holder of feed (excluding retail) performing the following process steps to the exclusion of any other: procurement, reception, storage - transfer, loading and delivery.

For the purpose of this standard, the terms "feed" will be used for all products falling within its scope (premixes and all types of food).

Feed materials: Products of vegetable or animal origin, whose principal purpose is to meet animals' nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives, which are intended for use in oral animal-feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixes (Regulation 767/2009).

Incoming Material: In the text of this guide, any product entering in the composition of animal feed, for any purpose in business, manufacturing, distribution or trade, such as:

- Feed materials,
- Additives,
- Premixes,
- Processing aids,
- Medicated premixes,
- Compound feed

Merchant: an economic operator exclusively carrying out purchases and resale actions in the form of incoming materials or compound feed (without physical possession of feed).

Sensitive Feed Materials (MPS) : guaranteed feed materials ≤ 0.9% of GMOs for which there are GMO varieties authorized for distribution in the European Union, and from production areas where these GMO varieties are not authorized for cultivation.

2 GMO Feed safety management

2.1 Risk analysis for feed materials

2.1.1 Feed materials

The feed materials used are not subject to GMO labelling within the meaning of Regulation (EC) No 1829/2003.

2.1.2 Risk analysis for MPR and MPS identification

The feed manufacturer, distributor or merchant must perform a risk analysis on feed materials used, distributed or traded, considering GMO to identify the MPR and MPS.
Nota Bene: Feed materials: Products of vegetable or animal origin, whose principal purpose is to meet animals' nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives, which are intended for use in oral animal-feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixes (Regulation 767/2009).
A feed material composed by several ingredients (e.g : products from biscuit factory, pastery,..), as the same as a complementary feed, does not need a MPR/MPS identification ingredient per ingredient.

The scopes covered by the risk analysis should be relevant and take into account all the events authorized for marketing within the European Union. (see European register of authorized GMOs[1]).

[1] https://webgate.ec.europa.eu/dyna2/gm-register/

Appendix 1 - Help in identifying feed materials likely to contain GMO - allows manufacturers to carry out a risk analysis according to the plant species and the origin of the feed material and, consequently, to define the minimum level of guarantees to be obtained from the suppliers.

In the case of at-risk or sensitive feed materials (MPR / MPS) placed on the market by their owner, the feed manufacturer, distributor or merchant and which do not pass through the plant, the owner must:

- ensure that its supplier of MPR / MPS communicates to him the origin of the material,
- recover from its supplier of MPR / MPS the risk analysis relating to the management of GMOs,
- ensure that its supplier of MPR / MPS performs GMO analyzes,
- ensure that its supplier of MPR / MPS undertakes to transmit to him any result that is strictly greater than 0.9%.
- must carry out a traceability exercise on a MPR / MPS delivered directly in livestock breeding (delivery in breeding> transport> storage> country of production of the feed material). The frequency of this traceability exercise is based on the risk analysis and must be performed at least once a year.

2.1.3 Samples of feed material

a) When troubleshooting a compound feed analysis result strictly greater than 0.9% GMO, feed material samples from the manufacturer can be analyzed. For this, the manufacturer or the wholesale distributor makes sure to keep samples weighing approximately 300 g.

b) The shelf life of the samples of each batch of feed materials is defined in coherence with the activity of the company.

2.1.4 Self-monitoring plan of feed materials

a) The frequency and relevance of self-monitoring analyses are determined according to the risk analysis. The manufacturer, or the distributor or the merchant can use the analytical control plan from its supplier and the guarantees offered by the feed material origin as a basis.
At a minimum one analysis will be performed by MPR when extractable DNA is present.

b) The feed material control plan must not be based solely on supplier analyses. The feed manufacturer and the wholesale distributor undertake to carry out feed material analyses on physically held materials as part of its risk analysis when there is a feed material with extractible DNA. (For more details on matrices not eligible, see the « Guide technique Analyses OGM » published by La Coopération Agricole Nutrition Animale and SNIA

2.1.5 Pooled- self monitoring plan

The feed manufacturer and the wholesale distributor participate in the pooled-self monitoring plan on the detection and quantification of GMOs, implemented by OQUALIM **and,** if one exists, **in the OQUALIM pooled self-monitoring plan for feed safety** corresponding to their main activity, or sector plan for sites located in Belgium.

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2.1.6 Compound feed

When the feed manufacturer, or the distributor or the merchant distributes a compound feed for "fed without GMO*" sector (*<0.9%), under its RCNA -STNO certification, the compound feed must be from an OQUALIM-STNO certified site or from a certification standard recognized as equivalent by OQUALIM.

The wholesale distributor must sample its bulk products.

The merchant must:

-perform or ensure that sampling of its products is done by the supplier

- must carry out a traceability exercise on a MPR / MPS delivered directly in livestock breeding (delivery in breeding> transport> storage> production site of the feed material). The frequency of this traceability exercise is based on the risk analysis and must be performed at least once a year.

2.2 Risk analysis of process

2.2.1 Risk analysis of cross contamination

The identification of transfer risks and the definition of means to be introduced to limit them are specific to feed production or feed storage tool (feed materials and/or compound feed). Indeed, solutions adopted and effective in one factory cannot be reproduced systematically in other factories. A specific risk analysis must be performed. The requirement level must be equal for all productions destinated to "fed without GMO$^{<0.9\%"}$

2.2.2 Control of cross-contamination

For sites where GMO feed materials are used, the feed manufacturer sets out and installs means of limiting the transfer of feed material from one batch to another (cross contamination) at a technically unavoidable level.

The feed manufacturer incorporates these GMO-specific means ("control of labelling rules for no GMO present") in the factory's quality system.

The feed manufacturer or distributor must validate and documents their qualification test of cross-contamination at each step of the process. Any process modification justifies a revision of the risk analysis and control measures.

2.2.3 Identification and Traceability

During the manufacturing stages, the manufacturer installs an identification and traceability system to:

- ensure exhaustive traceability of formulae manufactured using registration, classification and archiving methods (traceability of successive batches);
- register the type and quantities of feed materials used in each compound feed batch;
- troubleshoot a malfunction effectively and withdraw or recall an animal feed quickly, if appropriate;
- identify the destination of each batch of feed.

2.3 Analytical monitoring for compound feed

2.3.1 Internal analytical monitoring plan for compound feed

An analytical monitoring plan is set up **throughout the year** consistent with the manufacturing and distributing activities (Compound feed manufacturing, compound feed distribution transformation of feed materials, feed material distribution) and the diversity of feed formulae manufactured under specifications excluding the use of GMO.

Event research will focus on the sensitive and risky feed materials (MPS and MPR) present in the formula for manufactured animal feed. For sites where GMO and non-GMO feed materials are used, at a minimum 30% of GMO analyses will be performed on feed recipe containing non-GMO feed materials coexisting with GMO feed materials, subject to the relevance of tonnages and number of formulas containing the feed materials and intended to customers requiring the STNO certification.

The minimum frequency of analysis for manufactured feed is defined in accordance with the following table:

Annual production under specifications excluding the use of GMO feed materials	Analysis frequency per year
<4000 T or for "non-GMO"[2] dedicated sites	4 analyzes
4000 T to 12000 T	1 analysis for 1000 T
12000 T to 50 000 T	12 analyzes
50 001 T to 100 000 T	15 analyzes
100 001 T to 200 000 T	20 analyzes
200 001 T to 300 000 T	25 analyzes
>300 000 T	5 additional analyzes every 100 000 T

2.3.2 Interpretation of analyses results

The results of analyses on compound feed constitute a monitoring indicator for the specific GMO quality system set up by the manufacturer.

Feed analysis results produced as part of the internal monitoring plan are recorded and interpreted according to the decision tree in Appendix 2 - Factory analytical monitoring plan: management procedure for a "compound feed" analysis in the event of results strictly greater than 0.9% GMO.

Test results on manufactured feed made under external controls are interpreted according to the decision tree in Appendix 3 - Audit of "GMO-free fed" technical platform - or according to specific contractual requirements.

2.3.3 Improvement plan

Regardless of the conclusion drawn from the analysis results strictly greater than 0.9% GMO by the decision tree (Appendix 2), when the frequency exceed they are more frequent than the frequencies defined by the nomogram shown below, the manufacturer or the distributor applies a plan to improve the means of limiting cross contamination in the factory.

[2] Sites where there is no feed (feed material or compound feed) labelled GMO, or where processes of feed not labelled GM and labelled GMO are separated, or where there is no risk of mixing at storage between feed not labelled GMO and labelled GMO (feed manufactured on site and distributed feed).

Number of analyses carried out under the factory monitoring plan	Number of results strictly greater than 0.9% GMO, beyond which a plan to improve means used in the factory must be implemented
4	1
5	2
6	2
7	2
8	2
9	2
10	3
11	3
12	3
>12	25% of the number of analyses

3 Sampling and analysis management

3.1 Analysis results

The fields covered by the search for GMOs are relevant and allow to detect all the events authorized for marketing within the European Union. [3]

Each GMO analysis result must be processed and interpreted by the company.

[3] https://webgate.ec.europa.eu/dyna2/gm-register/

[4]The analytical tolerances are taken into account to draw a conclusion on the conformity of the analysis as per the provisions of Regulation (EC) No 152/2009:

~~*[GMO content = analysis result - analytical uncertainty]*~~

For the interpretation of the results, case of genes stacking and, particularly, taking into account the analytical uncertainties, the operators will refer to the technical documentation entitled "Technical Guide analyzes GMO" published by the SNIA and Coop de France Animal Nutrition.

In accordance with Article 12 of Regulation (EC) No 1829/2003 of 22nd September 2003, the labelling requirement for genetically modified organisms does not apply to 'feed containing a material containing GMOs consisting of such organisms or produced from such organisms in a proportion not exceeding 0.9% of the feed and of each of its components, provided that such presence is fortuitous or technically unavoidable.'
Feed containing, a GMO-containing material, consisting in such organisms or produced from such organism in a proportion less than or equal to 0.9% of the feed and each of its components is therefore not labelled in the meaning of the regulation, provided that this presence is fortuitous or technically unavoidable.

An result strictly greater than 0.9% GMO in a compound feed, whereas the feed materials contain less than 0.9% GMO, can be due to:

- **the presence of botanical impurities:** transferred accidentally during cultivation, storage or transport (permitted by the regulations up to 5%). Thus, the feed manufacturers are likely to incorporate feed materials possessing small quantities of other plant species (e.g. soya grains found in oilseed rape grains). These botanical impurities are added, if they are GMO, to the analysis result of a compound feed containing a feed material likely to be GMO.
- **cross contamination** during the manufacturing process (mixing, grinding, granulation, etc.), storage and transport : adventitious and technical unavoidable transfer of small quantities from a batch of feed material or compound feed to another batch of feed material or compound feed.
- **the amount of MPR and/or MPS incorporated:** the results of analyses (% GMO) of compound feed are expressed in relation to a plant species.
- **sampling and analysis problems:** difficulty in obtaining a representative sample and for a same sample, significant dispersion of results of analyses performed by different laboratories.

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3.2 Laboratories

The GMO search analyses are carried out in **COFRAC-accredited laboratories or an equivalent accreditation body** following **ISO 17025**. The accreditation relates to the participation in an inter-comparison circuit between laboratories and the following reference methods:

- **NF EN ISO 21569** – Food products - Analytical methods for the detection of genetically modified organisms and derived products - Qualitative methods based on the use of nucleic acids;
- **NF EN ISO 21570** - Food products - Analytical methods for the detection of genetically modified organisms and derived products - Qualitative methods based on the use of nucleic acids;
- **NF EN ISO 21571** - Food products - Analytical methods for the detection of genetically modified organisms and derived products - Extraction of nucleic acids;
- **NF EN ISO 24276** - Food products - Analytical methods for the detection of genetically modified organisms and derived products – General requirements and definitions.

If a laboratory is referenced on the OQUALIM website for the couple GMO- matrix concerned, the requirement is considered to be respected.

3.3 Size of samples for laboratories

The minimum sample sizes are recommended in the technical documentation entitled "Technical guide for GMO analyzes" published by the SNIA and Coop de France Nutrition Animale.

4 Communication

4.1 Commitment to the client

Whatever is the activity covered by the scope of certification, the application of the three pillars of the technical platform, guaranteed incoming materials ≤ 0.9% GMO, implementation of means to reduce cross-contamination to a technically unavoidable level, and implementation of analytical monitoring of animal feed, enables the certified company to meet the expectations of clients committed to a "fed without GMO* (<0.9%)" supply chain.

4.2 Positive declaration

Any STNO certified company must affix a positive declaration of the OQUALIM's brand on its manufactured and/or sold products.

According to the use of the trademark defined in the document "Instructions for Use of the OQUALIM's brand and logo".

4 Incident report

Any incident will be transmitted to OQUALIM according to the modalities describes in Appendix 4.

What is an incident for STNO ?

An incident is a scenario involving that animal feed not complying with the requirements of the technical platform would be placed on the market at minimum for any client requesting STNO certification with a labelling complying with STNO requirements and could put at stake the reputation and credibility of the STNO certification.

The incident report applies in the cases below:

- Animal feed labelled GMO in accordance with Regulation (EC) No 1829/2003 of 22nd September 2003 AND containing material feed labelled GMO have been placed on the market with a positive declaration ("fed without GMO<0.9%") linked with the STNO certification of the site placing these feed on the market.
- Animal feed containing containing material feed labelled GMO unauthorized for distribution inEurope, have been placed on the market by a STNO site certified with the positive declaration "fed without GMO$^{<0.9\%}$")

OQUALIM and stakeholders must be informed at least simultaneously.

How to report an incident ?

Certified companies must notify incidents to OQUALIM by filling the incident report form according to modalities in appendix 4 "Incident report"

In the case of doubt, a company not sure to face an incident will inform OQUALIM. Compagnies concerned or informed by an incident will forward it.

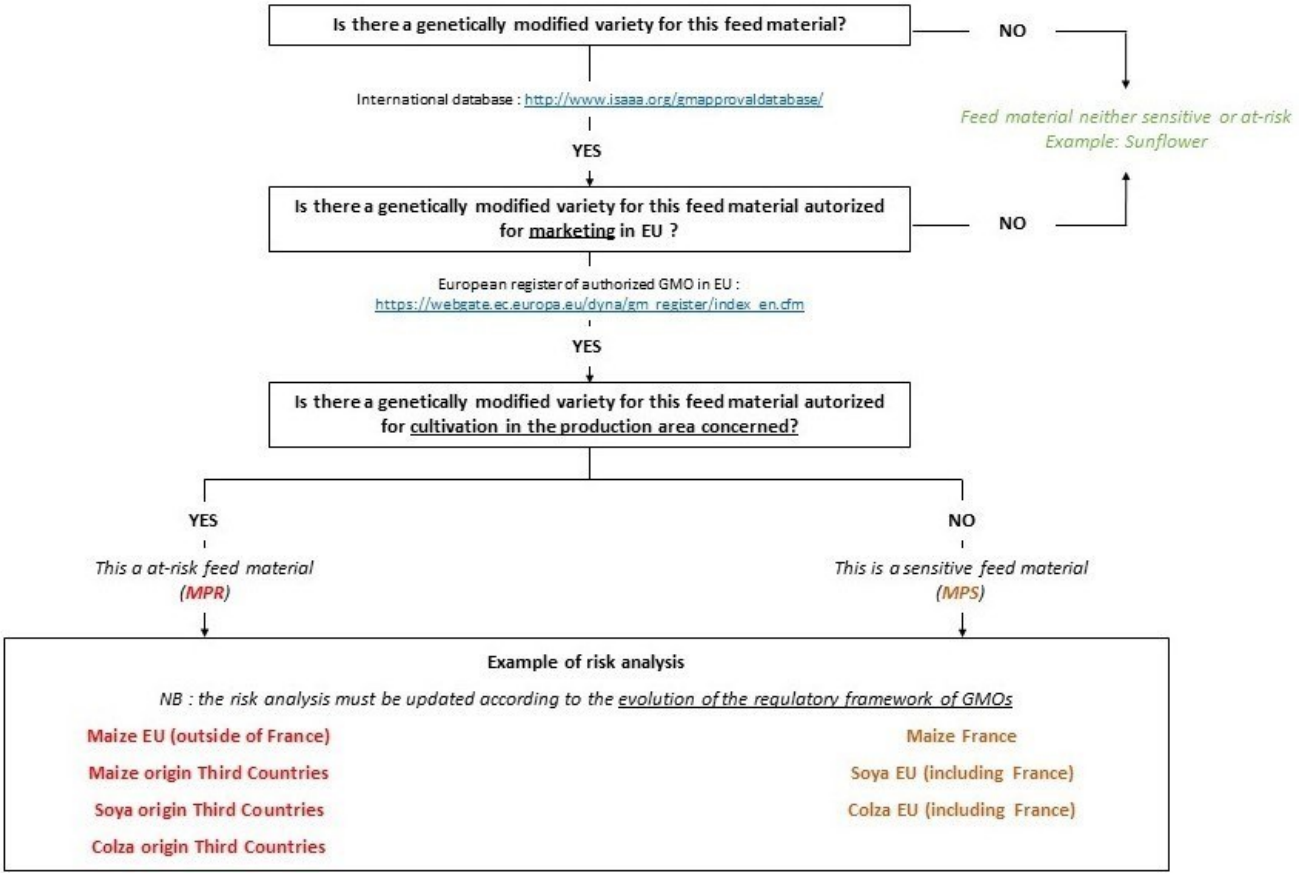
In general, the sooner is the better to communicate the information. After an incident report, if necessary, OQUALIM can give you information to manage the situation and to avoid damages in your site, the partners and the STNO standard.

Appendix 1 - Help in identifying feed materials likely to contain GMO

The list of feed materials likely to be affected by the GMO issue is evolving regularly as GMOs develop worldwide (authorization to cultivate and / or market). In order to propose a perennial scheme, the decision tree below can help in identifying risky and sensitive feed materials.

Sensitive Feed Materials (MPS) : guaranteed feed materials ≤ 0.9% of GMOs for which there are GMO varieties authorized for distribution in the European Union, and from production areas where these GMO varieties are not authorized for cultivation.

At-risk Feed Materials (MPR) : guaranteed feed materials ≤ 0.9% of GMOs for which there are GMO varieties authorized for distribution in the European Union, and from production areas where these GMO varieties are authorized for cultivation.



Feed materials with existing GMO varieties authorized in the distribution in the European Union and with an unknown cultivation area must be considered at risk (MPR)

Appendix 2 - Factory analytical monitoring plan

Pillar 1	Pillar 2	Pillar 3
Guarantees « without GMO $^{\leq 0.9\%}$ » on feed materials used for manufacturing feed	Control of cross contamination between manufacturing GM and « without GMO $^{\leq 0.9\%}$ » feed	Monitoring plan on feed to check control on pillars 1 and 2

Monitoring does not reveal an overtaking, pillars 1 and 2 are controlled.

Result < 0.9%

Monitoring reveals an overtaking, **troubleshooting identifies those one of the 2 pillars is not respected.** The manufacturing scope can be delimited:
Information of OQUALIM, Information of concerned clients,
Downgrading of feed concerned, labelling and / or internal retreatment of feed still in stock.

-Troubleshooting carried out by the feed manufacturer within 72 working hours

Result > 0.9%

Monitoring reveals an overtaking, **troubleshooting identifies that the three pillars ~~1 and 2 pillars~~ arerespected.**
If at least 75% of analyses are <0.9% for the last twelve months, the process is considered as controlled. **The 3 STNO's pillars are controlled**.
Information for OQUALIM, information for customers concerned as soon as the result is >0.9%
Labelling and / or internal retreatment, respecting the GMO nature of the batch, feed still in stock, and not delivered.

- Feed barred by computer in the plant

Result > 0.9%

Monitoring reveals an overtaking, **troubleshooting identifies that pillars 1 and 2 pillars are respected.**
If more than 25% of analyses reveal an overtaking an improvement plan must be implement for pillars 1 and/or 2.
Labelling and / or internal retreatment, respecting the GMO nature of the batch, feed still in stock, and not delivered.
From overtaking 25% of analyses with results >0.9%, information of OQUALIM, information of intended clients of analysed batches with results >0.9%

-Research of the traceability of the livestock farms concerned

Result > 0.9%

Appendix 3 - Audit of "GMO-free fed" technical platform

GMO analysis result >0.9%

Is the genetically feed material detected present in the theoretical composition of feed (formula) ?

YES *(present in the formula)*

NO *(not present in the formula)*

To be carried out within 7 working days following the analysis result

- ✓ Computer blockage of the feed concerned in the plant
- ✓ Research of traceability of the livestock farms concerned

YES *(presence)*

Is the vegetal species detected present in the formula of the feed base on the manufacturing plotter? (over time) ?

NO *(non presence)*

Adventitious presence or technically unavoidable : **filed closed.**

Feed delivered in bulk and analysis performed using asample taken from the feed manufacturer
OR
Feed delivered in bags and analysis performed using asample taken from the livestock breeder

Feed delivered in bulk and analysis performed using a sample taken from the livestock breeder
OR
Feed delivered in bags and analysis performed using a sample taken in an open bag from the livestock breeder

Counter analysis performed using a sample taken the feed manufacturer

Conter-analyse < 0.9%

Filed closed for feed manufacturer

Non compliance to be monitored on the farmer's premixes :

- questionnaire showing a source of contamination in the farm

OR

- No response within 7 working days
  - ⇨ farmer suspended
  - ⇨ new audit by the group, 6 weeks suspension for laying hens

Conter-analyse > 0.9%

Troubleshooting carried out by the feed manufacturer

Are all the three requirements met?

1. Compliance with the specific GMO quality system (RCNA-STNO (OQUALIM))
   AND
2. 'GMO free' guarantees in the feed materials used to manufacture the feed batch in question ≤0.9%
   AND
3. Feed materials and compound feed monitoring plan carried out and > 0.9% GMO analysis result(s) processed according to this management procedure

YES, the three point are compliant & response within 7 working days

Non compliance with one of these 3 points and/or no answer within 7 working days

- ✓ Animals are barred by computer
- ✓ Batch of animals that have consumed the feed following the risk analysis (feed duration, %...) declassified
- ✓ Feed batch in question declassified
- ✓ Feed batches manufactured with this same feed material declassified following the risk analysis

Compliance with the specific GMO quality system RCNA-STNO (OQUALIM) and processing of >0.9% GMO analysis result

- Setting up a corrective action plan and sending it to the Certification Body within 15 working days
- Proof to be provided including at least 5 analyzes on different batches and compliant

No compliance with the specific GMO quality system RCNA-STNO (OQUALIM) and processing of >0.9% GMO analysis result

In the event of no or irrelevant response to the Certification Body within 15 working days

Adventitious presence, corrective actions introduced if appropriate : **filed closed**.

Feed manufacturer suspended
Corrective action plan set up
Proof to be provided to the Certification Body for requalification including at least 5 analyzes on compliant batches

Verification of the application and effectiveness of the action plan at the next audit

Appendix 4 – Incident report

I- STNO incident report form

(to send to : contact@oqualim.fr completed and signed)

1 – Company information	
Company ..... - Site: ..... - Address: ..... ☐ Manufacturer ☐ Distributor *Of the product at the origin of reporting*	Contact : - First name Last name:..... - Position: ..... - Phone :..... - E-mail: .....

2 – Information regarding the report	
Concerned product: ☐ Compound feed manufactured on-site Date of manufacture :_ _/_ _/_ _ _ _ ☐ Purchase of compound feed ☐ Purchase of feed material Name of supplier : ..... Address :..... Contact :..... Date of delivery : :_ _/_ _/_ _ _ _ ☐ Compound feed manufactured for a third part Name of third part : ..... Address :..... Contact :..... - Commercial name(s) : ..... - Batch number[1] : ..... - Quantity concerned (precise the one placed on the market): ..... Date of manufacture or delivery: :_ _/_ _/_ _ _ _ - Marketing period : From _ _/_ _/_ _ _ _ ……to ……_ _/_ _/_ _ _ _	Type of incident : ☐ Placing GMO feed on the market without the appropriate label, intended to use to "fed without GMO<0.9% sectors ☐ Placing on the market feed material labelled GMO unauthorized to distribution in Europe Cause of the incident : .... The concerned parts have been informed about the incident: ☐ Clients ☐ Suppliers ☐ Sectors Is there any client certified with a standard in recognition with the STNO? ☐ Yes ☐ No

[1] : if unknown : Provide tje delivery slip number

2 – Information regarding the report (to be continued)	
Results of analyses ☐ A PCR analyse was performed (provide a copy of the report with the nature of the sample, sampling date and location, laboratory and results with the percentage per species) ☐ No GMO analyse was performed	
3– Action plan	
	Comments :

II- Communication to Oqualim

The requested information must always be communicated, in writing, to OQUALIM.

OQUALIM
Address : 41bis boulevard La Tour-Maubourg, 75007 PARIS -FRANCE
Email: contact@oqualim.fr

Courriel : contact@oqualim.fr

III- Confidentiality of information

Unless otherwise stated in this document, OQUALIM shall not disclose any confidential information regarding a company (or certification body) to third parties, without written consent from the company in question.

Communication with respect to an incident will only take place between the parties concerned.

When companies, covered by a quality system other than the STNO Standard, are involved in an incident, and as OQUALIM has a mutual recognition agreement with those feed safety systems, the information regarding the incident will be communicated to the systems concerned.

Under no circumstances, shall OQUALIM, instead of the company, perform a notification. The company remains responsible for its legal obligations in terms of notification and risk management.