



**ISCC PLUS 205-03 Non GMO
for Food & Feed**

Non GMO for Food & Feed

ISCC PLUS 205-03
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1 Introduction

ISCC is applicable for all types of biomass and biomass-based products. Next to the mandatory requirements, which are for instance the sustainability standard for biomass production (202) or requirements on the chain of custody (203), the economic operator can choose from voluntary Add-ons. These add-ons are superior to the general ISCC PLUS standard. In general, only ISCC certified material is accepted under ISCC PLUS. It must be guaranteed that the whole supply chain starting from farm/plantation until last conversion unit is ISCC certified. For further information, please study requirements on the chain of custody (203). In case of the certification of crops not containing genetically modified organisms (hereinafter called “Non GMO”, whereby genetically modified material is referred to as GM material) or down-stream Non GMO raw materials the audit scope must be extended by using the ISCC Add-on for Non GMO for Food & Feed. The requirements of the Non GMO standard for Food & Feed are laid down in this document.

Major subject of certification described within this document are single farms, first gathering points and/or conversion units. This document describes requirements especially for producers of Non GMO material. Further downstream elements of the supply chain will not undergo additional audit procedures. After a successful audit an individual ISCC PLUS certificate for Non GMO can be issued. For the process of extension of the audit scope in the case of an existing certificate please also see ISCC PLUS 255 “ISCC Add-ons and Extensions”.

2 Scope

This document describes the requirements for supply chain elements, for which the requirements regarding production, supply and distribution of material considered for a Non GMO for Food & Feed certification, apply. Major level of certification described within this document is farm. However all further downstream supply chain elements must meet specific Chain of Custody requirements.

- (1) Management system of an enterprise, plant, factory premises or operation (responsibilities, procedures and reporting with respect to handling of GMO/Non GMO material)
- (2) Relevant elements of the production and distribution chain
 - a. Farm/plantation
 - b. First gathering point (warehouses or traders which source (buy) Non GMO biomass from a variety of farms or plantations and sell sustainable biomass to customers)
 - c. Conversion unit (traceability requirements apply as laid down in ISCC PLUS 203)
 - d. Warehouse (Storage of Non GMO biomass on demand of the first gathering point, i.e. the warehouse has to be located in the supply chain before the first gathering point and shall not buy biomass from farms and sell it to customers)

- e. Trader/warehouse (Storage and/or trade of Non GMO biomass or related products after the first gathering point; traceability requirements apply as laid down in ISCC PLUS 203)
- f. Transport of Non GMO products (e.g. with truck, train, barge or vessel; traceability requirements apply as laid down in ISCC PLUS 203).

3 Normative references

As a basic principle, all relevant ISCC documents are valid for the scope. The normative references display the documents whose contents are linked and have to be considered.

Relevant references:

ISCC PLUS	201	System Basics
ISCC PLUS	202	Sustainability Requirements – ISCC PLUS Standard on Sustainability Requirements for the Production of Biomass
ISCC PLUS	202a	Sustainability Requirements – Equivalence Benchmark
ISCC PLUS	203	Requirements for Traceability
ISCC PLUS	204-01	Mass balance requirements <u>or</u>
ISCC PLUS	204-02	Physical Segregation requirements
ISCC PLUS	205-05	Additional Guidance for GMO / Non GMO material
ISCC PLUS	255	ISCC Add-ons and Extensions
ISCC PLUS	260-02	Bioplastics
ISCC PLUS	260-03	Feed
ISCC PLUS	260-04	Food

4 Technical Provisions

4.1 Non GMO requirements

Different sets of Non GMO for Food & Feed requirements exist for

- 4.1.1. The farm/plantation
- 4.1.2. The supply chain

Requirements on the agricultural production level include criteria on seed input, safety distances and material handling at the farm/plantation. Requirements for the supply chain apply from the First Gathering Point downstream and include criteria on material handling and minimum GMO contamination thresholds.

4.1.1 Requirements for farm/plantations

a) Seeding Material

The farm/plantation that grows Non GMO feedstock must ensure, that seeding material or any other agricultural inputs are Non GMO materials. Seeding material shall be of Non GMO strains, e.g. by being listed as approved Non GMO variety in an official governmental variety list. Therefore, the farmer shall maintain evidence, like certificates of origin or copies of seed product tags. Alternatively, the farmer may provide evidence of independent PCR-analysis conducted by an authorized laboratory for samples of the seeding material.

b) Safety distances

The farmer growing Non GMO feedstock shall maintain appropriate safety distances from adjacent GMO-grown fields if necessary. In countries where GMO cultivation is per se not allowed or underlies very strict requirements on safety distances to Non GMO feedstock this criterion does not apply.

The requirement addresses the issue of GMO contamination of fields with “Non GMO” feedstock due to possible cross-pollination. In order to avoid cross-pollination, one shall check location and distances of fields of “Non GMO” feedstock and fields of GMO feedstock. In case foreign fields cannot be identified as Non-GMO fields, they have to be regarded as GM feedstock fields. The likelihood of crosspollination of different feed stocks, landscape conditions and the surrounding area should be taken into account when defining appropriate safety distances. The farmer/grower is requested to take adequate measures, e.g. appropriate distance to relevant fields. Adequate measures are laid down in the guidance ISCC PLUS 205-05.

c) Material handling at the farm/plantation

On farm level Non GMO for Food & Feed material has to be physically segregated from other GMO containing material. Non GMO crop has to be planted, cultivated, harvested, handled, and delivered using only equipment and facilities free of other varieties and other grain. Adequate measures of how to achieve the purity of other varieties and other grain are laid down in the guidance ISCC 205-05.

Farmers have to make a clear statement on the Non GMO crop on their sustainability declaration (e.g. delivery note, weighbridge ticket). This implies a direct reference on the document, e.g. “x tons of Non GMO for Food & Feed maize”. Additionally, farmers have to attach further

copies of evidence documents to the First Gathering Point that prove the Non GMO quality of the crop. This includes tags of used seeding material. Copies of this information have to be stored for at least two years by the recipient of the crop, e.g. the first gathering point.

4.1.2 Requirements on the supply chain

a) Non GMO threshold value

The GMO contamination of Non GMO for Food & Feed materials shall not exceed the threshold value of 0.9 % according to Regulation (EC) No 1829/2003 of the European Parliament and of the Council on genetically modified food and feed, provided that this presence is adventitious or technically unavoidable. In case where the biomass is supposed to apply for the German “ohne Gentechnik”-label GMO-contamination shall not exceed the threshold value of 0.1 %. In addition biomass products shall fulfil the criteria of the VLOG (Verband Lebensmittel ohne Gentechnik e.V. – German Association Food without Genetic Engineering) standard even in case that these are not labelled as such. It is recommended but not binding that a self-declaration from the biomass producers is issued stating the following: “With regard to the EU Regulations Regulation (EC) no. 1829/2003 and 1830/2003, we confirm that the delivered feed are not subject to labeling. Possible contaminations below the figure of 0.9% per biomass component are only tolerated if they are adventitious or technically unavoidable concluded.”

Non GMO for Food & Feed materials must be checked at the first gathering point for contamination via five random samples by an independent PCR (Polymerase Chain Reaction)-analysis conducted by an authorized laboratory. The procedure of sample choice is laid down in the guidance ISCC PLUS 205-05.

b) Material handling along the downstream supply chain

All downstream elements of the supply chain must be checked for their “best-practice handling” of avoiding GMO contamination. This refers to measures that actively reduce the likelihood of commingling or contamination with GMO material. Those measures are laid down in the guidance ISCC PLUS 205-05. After successful certification, supply chain elements shall include the term “Non GMO for Food & Feed” on their sustainability declaration (see also ISCC PLUS 203). Only material delivered with this additional information can be acknowledged as Non GMO for Food & Feed.

Each element in the supply chain shall ensure that the Non-GMO for Food & Feed compliant material is physically segregated from GMO material or material of unknown status. This applies to all conversion units, warehouses, silos as well as transport. Further information is provided in the system document ISCC PLUS 204-02, physical segregation.

Non GMO for Food & Feed material shall fulfill the requirements on traceability and information transfer as stated in ISCC PLUS 203 (Requirements for Traceability). Labelling according to Regulation (EC) No 1829/2003 and 1830/2003 must be correctly implemented for all claims on delivery notes, analysis results for delivered batches, certificates, delivery notes, confirmations and stipulations.