



ISCC 205-05 Additional guidance for GMO / Non GMO material

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Additional guidance for GMO / NON GMO material

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1 Introduction

The additional guidance for the treatment of GMO / NON GMO material gives further guidelines for sustainable biomass considered for the certification under ISCC PLUS 205-03 or ISCC PLUS 205-04 respectively.

Major subject of certification described within this document are single farms, first gathering points and/or conversion units. This document describes guidelines especially for producers of NON GMO material. Further downstream elements of the supply chain are requested to pay attention to the guidance for GMO material handling.

2 Scope

In addition to the ISCC documents 205-03 and 205-04, this document describes further guidance for the biomass production considered for the certification of material for Non GMO for technical markets or material for Non GMO for Food & Feed respectively. The additional guidance described hereafter is to be applied only for producers of sustainable biomass and its treatment along the supply chain.

3 Normative references

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

Relevant references:

ISCC PLUS	102	National and Regional Initiative
ISCC PLUS	201	System Basics
ISCC PLUS	202	Sustainability Requirements – Requirements for the Production of Biomass
ISCC PLUS	203	Requirements for Traceability
ISCC PLUS	205-03	Non GMO for Food & Feed
ISCC PLUS	205-04	Non GMO for technical markets

4 Additional guidance for requirements for the production of Non GMO biomass

4.1 Fundamentals

The requirements for the production of sustainable biomass are based on the six ISCC principles (see ISCC 202). Any farm or plantation that goes through an ISCC audit shall comply with relevant national and regional laws and regulations.

4.2 Field sizes and 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 the requirements on safety distances do not apply.

Safety distances between fields with Non GMO feedstock and fields with GMO feedstock are important to avoid cross-pollination. Therefore the location of so-called “Non GMO” and GMO fields must be determined. In this context, a Non GMO field is defined as one coherent “Non GMO” field even if it includes dividing features (such as water ways, trees, driveways or railroad tracks) as long as the farm/plantation subject to Non GMO certification owns and/or rents the entire field. Land that is owned or rented by any other third party cannot be considered in the field approach of a Non GMO certified farmer unless that land is farmed under the same Non GMO conditions.

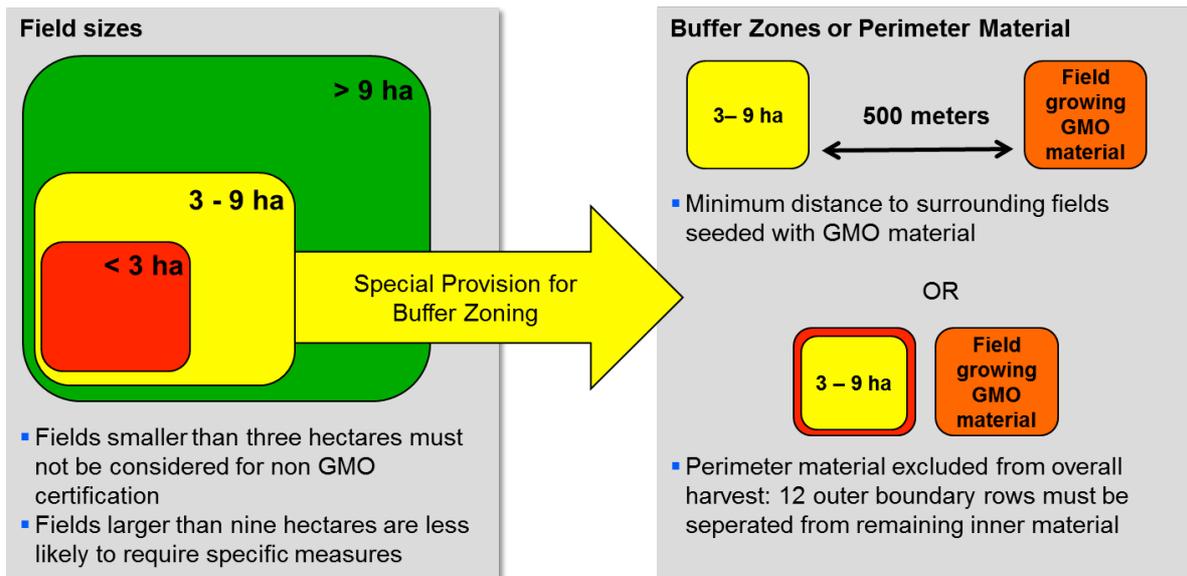
The following section describes the approach to determine safety distances between “Non GMO” and “GMO” fields. However, a farmer shall always take into account further factors that influence the likelihood of crosspollination, such as feedstock pollination characteristics, landscape conditions and surrounding area.

Generally harvests from fields of a size less than three hectares are less appropriate to be considered for Non GMO certification. Harvests from fields larger than nine hectares are less likely to require specific measures such as safety distances.

Harvests from field sizes between three and nine hectares and aiming for Non GMO for Food & Feed certification under ISCC PLUS 205-03 should be checked on their relative position to surrounding fields seeded with GMO material. Either

- a minimum distance of 500 meters as a “buffer zone” is kept between the two fields or
- perimeter material¹ of the “Non GMO” field is veritably excluded from the overall field harvest considered for certification. The perimeter material must be considered as GMO and physically segregated from the rest of the field harvest

¹ Perimeter material refers to the 12 outer boundary rows of material adjacent to surrounding fields on which GMO material is grown.



4.3 Material sampling for PCR analysis

Practical difficulties with a GMO-threshold lie in sampling and analysis that are not as easy and reliable as often assumed. An expanded measurement uncertainty can result in differing results. Especially GMO is usually not equally distributed in a batch, it usually appears in “clusters”. Several samples from one container can lead to diverging results – in the extreme from 100% GMO to not detectable. Analytical results therefore often rather give a snap shot than reliable information on a whole batch.

Thus, sampling of sustainable material shall be conducted preferably at different locations within the sampled batch. If possible, sampling could take place during the loading process. In any case at least five random samples from each batch considered for certification need to be drawn. With regard to the possible clustering of GMO material, the highest measured value is regarded as the one that is vital for the threshold value laid out in ISCC PLUS 205-03.

PCR-analysis must be conducted by authorized laboratory and the result of the analysis must be clearly allocated to the sampled batch.

4.4 Material handling and avoidance of commingling

Measures of correct material handling may include the storage of Non GMO material in unique containers only used for Non GMO material as well as the use of explicit machinery that is exclusively used for the handling of Non GMO material. In cases of the use of containers and machinery for both GMO material (or even material with unknown origin) as well as Non GMO material, the management should provide detailed proofs of cleaning procedures before every treatment of Non GMO material in its machinery and storage facilities. The results of these activities should be documented or otherwise obvious when being viewed or assessed by the certification body and its auditors.