## **FAQs for EFISC-GTP companies**

Frequently asked questions and answers about the module EFISC-GTP Purchase of certified sustainable feed material.

Please note that this document contains also indications for EFISC-GTP companies that wish to deliver soy products to the QS system

## Questions related to the certification scope

1. Which companies fall within the scope of the module EFISC-GTP Purchase of certified sustainable feed material.

<u>Answer</u>. From January 1, 2024, all companies (both producers and traders) that want to sell soy-based feed material to companies certified according to the QS scheme, will have to equip themselves with a sustainability certification system for soy that is recognized by QS. Since the EFISC-GTP module has been recognized by QS, EFISC-GTP companies can voluntarily adopt it in order to sell soy products to QS. The soya products in the scope of this module are the ones indicated in the paragraph 2 of the <u>Sector reference document on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining</u> - Version 4.0., from the Catalogue of feed material number 2.18.2 to 2.18.14

2. What must an EFISC-GTP company that produces or sell soy-based feed do to deliver these products to the QS scheme before January 1, 2024?

<u>Answer</u>: The EFISC-GTP company, in order to have the eligibility to deliver soya products into the QS scheme, has to declare in the QS database by **31.12.2023** at the latest whether it handles soy and comply with the requirements of the EFISC-GTP module from 01.01.2024: the company has to select EFISC-GTP from the list of recognized schemes following the link: <a href="https://www.q-s.de/softwareplattform/en/">https://www.q-s.de/softwareplattform/en/</a>

Compliance with the requirements of the EFISC-GTP Purchase of certified sustainable feed material applies from **01.01.2024**, but compliance with the requirements can be checked in the next regular audit. In other words, the verification of compliance with the requirements (audit from the certification body) can take place retroactively in the next regular EFISC-GTP audit in 2024.

Note: more specific information can be found in **Annex 1** at the end of this document.

3. What happens if an EFISC-GTP company (producer or trader) decides to adopt a certification system for soybeans (chain of custody certification) other than the EFISC-GTP Purchase of certified sustainable feed material module?

<u>Answer</u>. The company has to check whether the certification system it wishes to adopt for soybeans is recognized by the QS system. See annex 4.3: <a href="https://www.q-s.de/feed-animal-meat/deforestation-free-soy-in-qs-feed.html">https://www.q-s.de/feed-animal-meat/deforestation-free-soy-in-qs-feed.html</a>

If the system is recognized the company has to follow the instructions contained in question number 2.

4. What do feed companies have to do if contracts for 2024 have already been concluded for non-certified products?

<u>Answer</u>. The not sustainable certified material can be compensated by the company by purchasing credits (book & claim). See paragraph 15.4 of the module EFISC-GTP Purchase of certified sustainable feed material.

5. Is an organic certification of soybean cultivation recognized for module EFISC-GTP Purchase of certified sustainable feed material?

<u>Answer</u>. In case of delivery to the QS scheme, the standards for primary production accepted by QS are indicated in the QS Annex 4.1: <a href="https://www.q-s.de/feed-animal-meat/deforestation-free-soy-in-qs-feed.html">https://www.q-s.de/feed-animal-meat/deforestation-free-soy-in-qs-feed.html</a>

Standards that are not published there are not recognized by QS for soy deliveries.

6. Being certified according to the requirements indicated in module EFISC-GTP Purchase of certified sustainable feed material, also allow companies to comply with the provisions of European regulation 2023/1115 of the European Parliament and of the Council of the 31 May 2023 on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation?

Answer. No, recital number 52 of the **EU Reg. 2023/1115** says "In order to recognize good practice, certification or other third party verified schemes could be used in the risk assessment procedure, however, they should not substitute the operator's responsibility as regards due diligence". In other words, this certification can be used as a support in determining risk, but cannot replace the obligation on the part of companies to prepare the due diligence as required by the EU regulation.

# Questions related to compliance with the requirements contained in module EFISC-GTP Purchase of certified sustainable feed material.

7. Is it possible to switch from one model (chain of custody) to another within the same purchase and sale (from a more "restrictive" one to less "restrictive" but not vice versa)? for example: IP for purchase, stored segregation, mass balance for sale? or also: I purchase IP, I sell partly IP and partly Mass balance because it was sold together with another sustainable product purchased mass balance?

<u>Answer</u>. The operator can use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: *Identity Preserved -> Segregated -> Mass Balance*.

8. Release procedure in the chain of custody Identity preserved and Segregation means a warehouse cleaning procedure? Would mechanical dry cleaning be enough?

Answer. Release procedure is mentioned in page 9, paragraph 15.1 of the module EFISC-GTP Purchase of certified sustainable feed material: "To avoid mixing in storage facilities, a release procedure must be established before a change of product". From the definitions in the EFISC-GTP module: Segregation is a chain of custody model where the certified sustainable feed is kept physically separated from the uncertified feed throughout the entire supply chain. No any cleaning measure: there should be a system in place to ensure goods are not mixed.

9. Can internal systems be used for recording quantities and sustainable data even Excel files for example.

Answer: yes accepted

10. An EFISC-GTP industry is certified (as generic EFISC-GTP certification adopting the Fediol sector document) for 3 different soya by-products. The company would like to certify only one product (for sustainability), maybe because the other 2 products will be not sent to the scheme QS. They want to use only mass balance. Is it possible?

Answer: Yes

11. Is there a special labeling to be applied to the feed materials falling in the scope of the module EFISC-GTP Purchase of certified sustainable feed material?

<u>Answer</u>. EFISC-GTP adopts a negative labeling. It is necessary to follow the indications provided in the Annex 3 of the module.

12. How long can the Book&Claim (B&C) and Mass balance (MB) chains of custody be used?

<u>Answer</u>. Making specific reference to the companies that supply material to the German QS scheme, this accepts the supply chain models B&C and MB until at least 2025, as long as deforestation-free is guaranteed.

13. Does soy from European cultivation also have to be certified according to a primary standard?

<u>Answer</u>. Yes, as indicated in the Annex 1 of the EFISC-GTP Purchase of certified sustainable feed material, the certification schemes for primary production accepted by EFISC-GTP are the ones recognized by the FEFAC Soy Sourcing Guideline

(<u>https://standardsmap.org/en/identify?client=FEFAC</u>). Companies delivering soybean and soybean by-products to the QS scheme must refer also to the Annex 4.2: <a href="https://www.q-s.de/feed-animal-meat/deforestation-free-soy-in-qs-feed.html">https://www.q-s.de/feed-animal-meat/deforestation-free-soy-in-qs-feed.html</a>.

### Questions related to the audit process

#### 14. What happens if a nonconformity is detected during the audit?

<u>Answer</u>. Detected nonconformities within the scope of the module EFISC-GTP Purchase of certified sustainable feed material, are handled in the same way as the nonconformities related to the normal EFISC-GTP certification (see the EFISC-GTP Rules of certification).

## 15. What type of audit must an EFISC-GTP company receive in order to demonstrate that it complies with the requirements contained in the EFISC-GTP Purchase of certified sustainable feed material module?

<u>Answer</u>. Many of the requirements contained in the EFISC-GTP Purchase of certified sustainable feed material module are already contained in the EFISC-GTP standard. This means that the best option is to combine a normal audit (e.g. recertification or surveillance audit) with an audit aimed at verifying sustainability requirements. We recommend reading what is indicated in paragraph 17 of the EFISC-GTP Purchase of certified sustainable feed material module.

## 16. How does certification work for those companies that decide to centralize the purchases of sustainable material?

<u>Answer</u>. In this case it is necessary to follow the instructions contained in paragraph 16 of the module EFISC-GTP Purchase of certified sustainable feed material.

<u>Example</u>: company composed by 2 traders and 8 production sites located in Europe.

In order to obtain the EFISC-GTP certification on sustainability and possibly deliver the certified material to the QS system, it is necessary to follow the following steps:

- A. the 10 sites (2 traders and 8 production sites) must already be EFISC-GTP certified
- B. the company will have to identify the main site: the others will be secondary sites
- C. by the end of 2023 it is necessary to communicate to the QS system that the company intends to adopt the module (follow the instructions in question 2).
- D. follow the instructions contained in paragraph 16 of the module EFISC-GTP Purchase of certified sustainable feed material
- E. the company has to inform the Certification Body so that it can verify the requirements contained in the module during the normal EFISC-GTP audit in 2024 regardless of the month in which this occurs: as indicated in question 2, the different sites will receive an audit finalized at verifying the requirements starting from January 1, 2024
- F. the minimum additional audit time for the main site will be 1.5 hours (see paragraph 17): for secondary sites the Certification Body should identify the minimum additional audit time
- G. the fee for the main site is 150 Euros and 100 Euros for secondary sites.

## Annex 1. Instruction for depositing information regarding soy in the QS database

Step 1. Login in the QS-Database

https://www.q-s.de/softwareplattform/en/

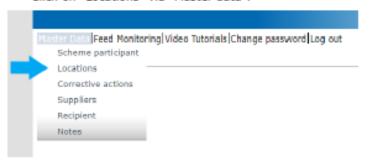


Enter user name (User-ID).

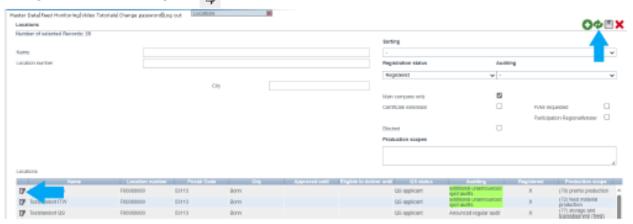
- Enter password.
- Click on "Login".

### Step 2. Deposit of information regarding soy

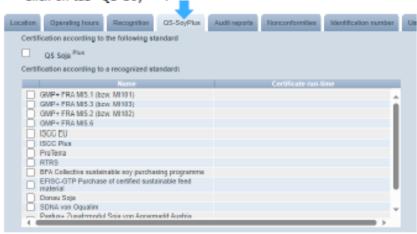
Click on "Locations" via "Master data".



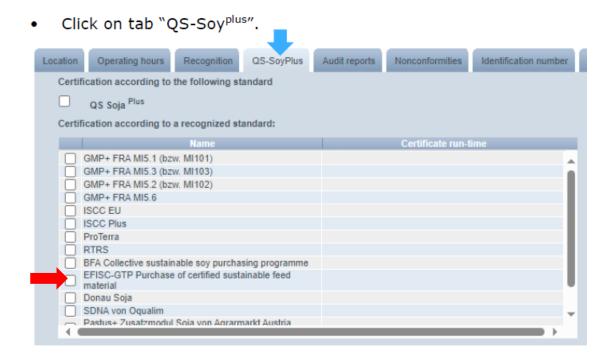
- Click and a list view with the locations will appear.
- Open location via edit symbol



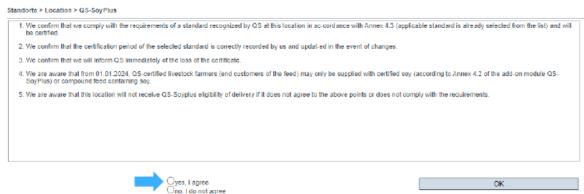
Click on tab "QS-Soy<sup>plus</sup>".



## Step 3. Selection of EFISC-GTP Purchase of certified sustainable feed as recognized standard for the add-on module QS-Soyplus



Click on "yes, I agree".



**Note:** If you do not agree, you will not receive the QS-Soy<sup>plus</sup> eligibility of delivery.

# Click "OK". Standorte > Location > QS-SoyPlus 1. We confirm that we comply with the requirements of a standard recognized by QS at this location in ac-cordance with Annex 4.3 (applicable standard is already selected from the list) and will be certified. 2. We confirm that the certification period of the selected standard is correctly recorded by us and updated in the event of changes. 3. We confirm that we will inform QS immediately of the loss of the certificate. 4. We are aware that from 01.01.2024, QS-certified livestock farmers (end customers of the feed) may only be supplied with certified soy (according to Annex 4.2 of the add-on module QS-SoyPlus) or compound feed containing soy. 5. We are aware that this location will not receive QS-Soyplus eligibility of delivery if it does not agree to the above points or does not comply with the requirements.

#### Step 4. Certificate run-time

## Case 1. companies that do not yet have certification but are aiming for it during 2024

· The pre-assigned certificate term 31.12.2024 appears automatically:



 Companies that do <u>not yet</u> have certification in accordance with a recognized standard but are aiming for this in the course of 2024 do not need to adjust the pre-assigned certificate term.

**Note:** As soon as certification is available, the pre-assigned certificate run-time can be overwritten accordingly (see point 2.2.2 below in these instructions).



#### Case 2. Companies that already have certification

The pre-assigned certificate term 31.12.2024 appears automatically:



• Enter the actual certificate run-time: overwrite the pre-assigned certificate run-time 31.12.2024.

