

Transition Guide for EFISC-GTP Companies and Certification Bodies

Be aware that this document aims at helping you to grasp the main differences between the old and the new versions of the codes. It cannot replace careful reading of the new EFISC-GTP code 4.0 itself.

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1. Introduction

This document helps companies (both EFISC and GTP) and Certification Bodies to comply with the new requirements set in the new EFISC-GTP Certification Code V4.0.

On the <u>EFISC-GTP website</u> you can already find two documents highlighting the text differences between the previous GTP Documents and the new EFISC-GTP Code 4.0 **(EFISC-GTP)** and COCERAL GTP Sector Document **(GTP S.D.)**:

- Comparison table GTP Code vs EFISC-GTP Code and GTP Sector Document link here
- Comparison table GTP Rules of Certification vs EFISC-GTP Rules of Certification link here

EFISC-GTP Code 4.0:

- EFISC-GTP Code 4.0
- EFISC-GTP 4.0 Rules of Certification

2. Table to be used by Companies

2.1 GTP Code vs new documents (what changes if your company is GTP certified?)

Nomenclature on	Where to find	Changes
GTP code v. 1.3 (old)	(new code)	
1. Introduction	EFISC-GTP (1.	In the EFISC-GTP code there is a reference to all the
	Introduction)	sectors covered by EFISC-GTP
1.1 Purpose	GTP S.D. (1.	
	Introduction)	
2. Scope and definitions	GTP S.D. (1.	
	Introduction)	
2.1 Scope and boundaries	GTP S.D. (1.1	
	Requirements for	
	the operators	
	feed/food safety	
	management	
	system)	
2.1.1 Trade operators in	GTP S.D. (1.	
the food processing	Introduction)	
industry		
2.2 Legal definitions	EFISC-GTP (2.6.1	
	Legal definitions)	
2.3 Other definitions	EFISC-GTP (2.6.2	
	Other definitions)	
2.4 Regulatory	EFISC-GTP(1.	
requirements	Introduction)	
3. Code section 1 GHP for	EFISC-GTP	
collection, trading,	(introduced)	
storage, transport		



3.1 General good trading	EFISC-GTP (4.1	
practices	Management	
practices	system)	
3.1.1 Management	EFISC-GTP (4.1	
responsibility	Management	
responsibility	responsibility)	
3.1.1.1 Management	EFISC-GTP (4.1.1	In the EFISC-GTP code there are more requirements for
commitment,	Management	the management activity (such as the crisis
responsibility and policy	commitment,	management)
responsibility and policy	responsibility and	managementy
	policy)	
3.1.1.2 HACCP team	EFISC-GTP (4.1.2	
leader	HACCP team leader:	
	responsibility,	
	authority and	
	communication)	
3.1.1.3 Management	EFISC-GTP (4.1.3	
review	Management	
	review)	
3.1.2 Resource	EFISC-GTP (4.2	The personal hygiene programme in the EFISC-GTP code
management	Resource	contains more requirements
	management)	·
3.1.2.1 Human resources	EFISC-GTP (4.2.2	The personal hygiene programme in the EFISC-GTP code
	Human resources)	contains more requirements
3.1.2.1 A Organisational	EFISC-GTP (4.2.2.1	
chart	Organisational chart)	
3.1.2.1 B Competency,	EFISC-GTP (4.2.2.2	
awareness and education	Competency,	
	awareness and	
	education)	
3.1.2.2 Infrastructure	EFISC-GTP (4.2.3	In the EFISC-GTP code there is a clearer description of
	Infrastructure and	the requirements regarding the infrastructure: exteriors,
	work environment;	buildings, floors, walls, ceilings, drainage facilities, doors
	4.2.3.1 Basic	and windows, lighting, ventilation and aspiration.
	requirements;	
	4.2.3.2	
	Requirements for	
	loading, storage,	
	production areas	
	and other feed/food	
	ingredient related	
	facilities; 4.2.3.3	
3.1.3 Maintenance	Equipment) EFISC-GTP (4.2.5	
3.1.3 Maniferiance	Maintenance)	
3.1.4 Traceability	EFISC-GTP (4.4.1	In the EFISC-GTP code there is a clearer description of
J.I.4 Haceability	Documentation	the requirements regarding the traceability system.
	requirements)	the regularity system.
3.1.5 Documentation	EFISC-GTP (4.4.2	In the EFISC-GTP code there is a clearer description of
5.1.5 Documentation	Traceability)	the requirements regarding the traceability system.
	Traceability	the requirements regarding the traceability system.



3.1.6 Food and Feed	EFISC-GTP	
	(Inspection,	
	sampling and	
	analysis)	
	EFISC-GTP (4.4.3.1	
	Sampling)	
3.1.6.1 Sampling and	EFISC-GTP (4.4.3.2	
l analysis requirements	Frequency of	
	analysis)	
	EFISC-GTP (4.4.3.3	In the EFISC-GTP code there are different requirements
	Laboratory and	for in-house testing
·	methods)	
3.1.6.3 Monitoring dioxin	GTP S.D. Annex	
3.1.7 Non-conforming	EFISC-GTP (4.4.4	
products	Control of non-	
	conforming product)	
	EFISC-GTP (4.3.6	
	Rework)	
	EFISC-GTP (4.2.8	
	Waste)	
	EFISC-GTP (4.3.4.1	
	Glass policy)	
_	EFISC-GTP (4.4.5	In EFISC-GTP, adoption of the new incident notification
	Crisis management –	protocol: <u>link here</u>
	withdrawal and	
	recall for safety	
	reasons)	In ESIGN CTD the are in the lint of a sint other house to be
	EFISC-GTP (4.4.6 Internal audits)	In EFISC-GTP there is the list of points that have to be
	EFISC-GTP (4.5.2	In EFISC-GTP there is the list of points that have to be
·	Customer	included in the procedure
	relationship)	included in the procedure
	EFISC-GTP (4.2.4	
•	Control of	
o e	monitoring,	
	measuring and	
	dosing devices)	
	EFISC-GTP (4.4.4	In EFISC-GTP there is the list of points that have to be
	Control of non-	included in the procedure
	CONTROL OF HORE	included in the procedure
3.2 GHP for trading	conforming product)	included in the procedure
3.2.1 The domain		In the EFISC-GTP code there is a clearer description of
	conforming product)	·
	conforming product) EFISC-GTP (4.4.1	In the EFISC-GTP code there is a clearer description of
	conforming product) EFISC-GTP (4.4.1 Documentation	In the EFISC-GTP code there is a clearer description of
3.2.2 Registration of	EFISC-GTP (4.4.1 Documentation requirements)	In the EFISC-GTP code there is a clearer description of the requirements regarding the domain
3.2.2 Registration of operators	EFISC-GTP (4.4.1 Documentation requirements) EFISC-GTP (2.5	In the EFISC-GTP code there is a clearer description of the requirements regarding the domain In the EFISC-GTP code there is a reference to the EU
3.2.2 Registration of operators 3.2.3 Requirements	EFISC-GTP (4.4.1 Documentation requirements) EFISC-GTP (2.5 Registration of the operator) EFISC-GTP (4.3.1.1	In the EFISC-GTP code there is a clearer description of the requirements regarding the domain In the EFISC-GTP code there is a reference to the EU Regulations and National legislations that must be
3.2.2 Registration of operators 3.2.3 Requirements purchasing	EFISC-GTP (4.4.1 Documentation requirements) EFISC-GTP (2.5 Registration of the operator)	In the EFISC-GTP code there is a clearer description of the requirements regarding the domain In the EFISC-GTP code there is a reference to the EU Regulations and National legislations that must be



3.2.3.1 Sourcing from	GTP S.D. (5.2.1.1	
assured sources	Sourcing of	
assarea sources	feed/food products	
	from certified	
	sources)	
		Incoming materials are more detailed in a table form
	EFISC-GTP (4.3.1.2	Incoming materials are more detailed in a table form
	Incoming material	
	requirements)	La EFICO CTD the control to the Part of control to the Land of the
2 2 2 2 The setal series	EFISC-GTP (4.3.1.3	In EFISC-GTP there is the list of points that have to be
3.2.3.2 The gatekeeper	Entry check	included in the procedure
procedure	programme)	
	EFISC-GTP (4.3.1.4	In EFISC-GTP there is the list of points that have to be
	Gatekeeper	included in the documentation package of gatekeeper
	protocol)	protocol. Moreover, EFISC-GTP certified companies can
		adjust the monitoring according to their risk assessment.
3.1.4 Traceability		
3.2.4 Recording of		
movement		
3.2.5 Labelling and		
accompanying documents		
3.2.6 Quality monitoring	EFISC-GTP (4.3.10	In EFISC-GTP there is the list of points that have to be
of stock inspection	Storage)	included in the procedure (rules controlling storage)
3.2.7 Goods with specific	EFISC-GTP (4.3.13	In EFISC-GTP code there is the list of requirements
regulations	Sales) / GTP S.D.	
	(5.2.1 Purchase from	
	trader and/or	
	farmer)	
3.3 GHP for collection /		
receipt operations		
3.3.1 The external	EFISC-GTP (4.2.3.2 a	EFISC-GTP code gives specifications regarding the
environment	Exteriors)	buildings
3.3.2 Receipt of goods	GTP S.D.	
3.3.2.1 Crop deliveries by	GTP S.D. (6.2.1	
farmers	Purchase from	
	farmer and/or	
	trader)	
3.3.2.2 Control at receipt		In the EFISC-GTP (GTP S.D.) code there is a reference to
for crop deliveries by		the ICRT-IDTF rules for transport.
farmers	GTP S.D. (6.2.3	
3.3.2.3 Control at receipt	Receipt of feed/food	
for deliveries if the	ingredients)	
terminal operator acts		
only as a service provider		
3.3.3 Pre storage and	GTP S.D. (6.2.4 Pre-	In the EFISC-GTP code (GTP S.D.) there is the guidance
drying	storage); Page 25	for pre-storage activities
urymg	(Guidance for	To pre-storage activities
	•	
2 4 GUD for storage	drying)	
3.4 GHP for storage		
operations		
3.4.1 The premises		



3.4.1.1 The construction	EFISC-GTP (4.2.3.2	In the EFISC-GTP the requirements are more structured
or modification of storage	Requirements for	and detailed
and handling premises	loading, storage,	and detailed
and galleries	production areas	
and ganeries	and other feed/food	
	related facilities)	
3.4.1.2 The lay out of the	related facilities;	In the EFISC-GTP code, there is the specific reference to
storage and handling	GTP S.D. (7.2.2.1	the "negative labelling". See paragraph 3.2 of this
premises and galleries: A.	Segregation of	document.
Prevention of cross	products)	
contamination		
2.4.4.2.The level of the	EFISC-GTP (4.2.5	In the EFISC-GTP, there are additional points to be
3.4.1.2 The lay out of the	Maintenance)	considered.
storage and handling premises and galleries: B.	EFISC-GTP (4.2.6	
Maintenance and	Cleaning,	
cleaning	disinfection and	
Clearing	sanitation)	
3.4.1.2 The lay out of the	EFISC-GTP (4.2.3.2 G	
storage and handling	Ventilation and	
premises and galleries: C.	aspiration)	
Ventilation	CTD C D /7 2 2 2	
3.4.1.2 The lay out of the	GTP S.D. (7.2.2.3	
storage and handling	Pesticide Treatment)	
premises and galleries: D. Pest Control		
3.4.1.3 Storage of	EFISC-GTP (4.4.3.1 B	In the EFISC-GTP, there is a more detailed procedure
samples	Sampling)	in the Erisc-GTP, there is a more detailed procedure
Samples	EFISC-GTP (4.2.3.2	In the EFISC-GTP code there is a complete list of
	Requirements for	requirements for the feed/food related facilities
	loading, storage,	, , , , , , , , , , , , , , , , , , , ,
	production areas	
	and other feed/food	
2.4.2.The wite handling	and other feed/food ingredient related	
3.4.2 The pits, handling	·	
3.4.2 The pits, handling and sorting equipment	ingredient related	
	ingredient related facilities) and EFISC- GTP (4.2.3.3 Equipment)	
	ingredient related facilities) and EFISC- GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6	
	ingredient related facilities) and EFISC- GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning,	
	ingredient related facilities) and EFISC- GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and	
and sorting equipment	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation	
	ingredient related facilities) and EFISC- GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2	
and sorting equipment 3.4.3 Traceability	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability)	
3.4.3 Traceability 3.4.4 Supervision of	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability) GTP S.D (7.1	
3.4.3 Traceability 3.4.4 Supervision of goods	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability) GTP S.D (7.1 General)	In the FFISC-GTP code there is a complete list of
3.4.3 Traceability 3.4.4 Supervision of	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability) GTP S.D (7.1 General) EFISC-GTP (4.2.4	In the EFISC-GTP code there is a complete list of requirements for calibration of instruments.
3.4.3 Traceability 3.4.4 Supervision of goods	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability) GTP S.D (7.1 General) EFISC-GTP (4.2.4 Control of	In the EFISC-GTP code there is a complete list of requirements for calibration of instruments.
3.4.3 Traceability 3.4.4 Supervision of goods	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability) GTP S.D (7.1 General) EFISC-GTP (4.2.4 Control of monitoring,	·
3.4.3 Traceability 3.4.4 Supervision of goods	ingredient related facilities) and EFISC-GTP (4.2.3.3 Equipment) EFISC-GTP (4.2.6 Cleaning, disinfection and sanitation EFISC-GTP (4.4.2 Traceability) GTP S.D (7.1 General) EFISC-GTP (4.2.4 Control of	·



3.4.7 Checking of the	GTP S.D. (7.2.1	In the EFISC-GTP code there is a complete list of
emptying storage	Receipt of feed/food	parameters to be checked.
3.4.8 Emptying of the	ingredients)	
conveyors	,	
3.4.9 Packaging	EFISC-GTP (4.3.10	
	Storage)	
3.4.10 Waste	EFISC-GTP (4.2.8	In the EFISC-GTP, there is a more detailed procedure
	Waste control)	
3.4.11 Glass policy	EFISC-GTP (4.3.4.1	In the EFISC-GTP there is an additional sentence
	Glass policy)	regarding the checking schedule of the facilities' glass
3.5 GHP for dispatch and	EFISC-GTP (4.3.11.1	In the EFISC-GTP, the transport type was split in
deliveries and transport	General transport	different sub-points and they are more detailed
	requirements)	
	4.3.11.2 Transport	
	operation packed	
	feed/food	
3.5.1 General rules	ingredients	
	4.3.11.3 Transport	
	operation bulk	
	feed/food	
2520	ingredients	
3.5.2 Own road transport	FFICE CTD	ok
3.5.2.1 General rules	EFISC-GTP	In the EFIC-GTP there is a more specific description.
	(4.3.12.4.a A) Road transport owned by	
	the operator)	
3.5.2.2 Infra structure	EFISC-GTP (4.3.11.3	In the EFIC-GTP there is a more specific description.
3.5.2.3 Basic	Transport operation	mane zine em anere is a more specime description.
requirements	bulk feed/food	
	ingredients	
3.5.2.4 Loading	GTP S.D. (8.2.2.1	
compartments	Requirements	
	regarding the	
	Loading	
	Compartment	
	Inspection)	
3.5.2.5 Loading	GTP S.D. (8.2.4	
	Loading of feed/food	
	ingredients)	
3.5.2.6 Transport	EFISC-GTP (4.3.11.3	In the EFIC-GTP there is a more specific description.
3.5.2.7 Unloading	Transport operation	
	bulk feed/food	
0.5.0.00	ingredients	
3.5.2.8 Cleaning	GTP S.D. (8.2.2.3	In the EFIC-GTP there is a description regarding the use
	Cleaning of the hold	of IDTF.
2.5.2.0.7	before loading)	A4
3.5.2.9 Traceability and	EFISC-GTP (4.4.2	More detailed in the EFISC-GTP
registration	Traceability)	AA
3.5.3 Road transport	EFISC-GTP (4.3.11.4-	More detailed in the EFISC-GTP.
subcontractor	c. Road transport	



	carried out by a sub-	
	contractor)	
3.5.3.1 By a carrier with		
GTP certificate or	EFISC-GTP (4.3.11.4.	
equivalent	c Road transport	In the EFIC-GTP there is a more specific description.
3.5.3.2 By a carrier	carried out by a sub-	pro-
without GTP certificate or	contractor)	
equivalent		
	GTP S.D. (8.2.2	Ok
	Transport via inland	
3.5.4 Transport via inland	waterway, by sea	
waterway, by sea and by	and by train)	
train	GTP S.D. (8.2.2.2	
	Requirements on the use of certified/non-	
	certified barges	
3.5.5 Road transport for	EFISC-GTP (4.3.11.4.	In the EFIC-GTP there is a more specific description.
which external parties are	c Road transport	in the Eric-GTP there is a more specific description.
responsible	carried out by a sub-	
responsible	contractor)	
3.5.6 Minimum	Contractory	
requirements for road		
transport: cleaning		
regimes		
3.5.6.1 Introduction		
3.5.6.2 Acceptance of the		
order and cleaning regime		
3.5.6.3 Check during	GTP S.D. (8.2.3 Use	
loading	of IDTF)	
3.5.6.4 Cleaning	,	
3.5.6.5 Monitoring and		
measuring		
3.5.6.6 Registration		
3.5.6.7 Corrective action		
3.5.6.8 Cleaning regimes		
and sequences		
4 HACCP	EFISC-GTP (6. HACCP	More detailed and specific in the EFISC-GTP
	SYSTEM)	



2.2 EFISC Code vs new documents (what changes if your company is EFISC certified?)

Nomenclature on EFISC code (old code)	Where to find (new code)	Changes
1. Introduction	EFISC-GTP (1. Introduction)	
2. Scope, Purpose and Definitions	EFISC-GTP (2. Scope, Purpose and	
	Definitions)	
2.1 Scope and purpose: use of this	EFISC-GTP (2.1 Scope and purpose:	
Guide	use of this Code)	
2.2 Structure of the Guide	EFISC-GTP (2.2 Structure of the	
	EFISC-GTP feed/food ingredient	
	safety assurance scheme	
2.3 EFISC governance	EFISC-GTP (2.3 EFISC-GTP	
	governance	
2.4 Exclusion of requirements	EFISC-GTP (2.4 Exclusion of	
	requirements)	
2.5 Registration of the operator	EFISC-GTP (2.5 Registration of the	
	operator)	
2.6 Definitions applicable to this	EFISC-GTP (2.6 Definitions	
Guide	applicable to this Code)	
2.6.1 Legal Definitions	EFISC-GTP (2.6.1 Legal Definitions)	
2.6.2 Other definitions	EFISC-GTP (2.6.2 Other definitions)	
3. Requirements on the feed safety	EFISC-GTP (3. Requirements on the	
management system	feed/food safety management	
	system)	
4. Management System	EFISC-GTP (4. Management	
	responsibility)	
4.1 Management responsibility	EFISC-GTP (4.1 Management	
	responsibility)	
4.1.1 Management commitment,	EFISC-GTP (4.1.1 Management	
responsibility and policy	commitment, responsibility and	
	policy)	
4.1.2 HACCP team leader:	EFISC-GTP (4.1.2 HACCP team	
responsibility, authority and	leader: responsibility, authority and	
communication	communication)	
4.1.3 Management review	EFISC-GTP (4.1.3 Management	
	review)	
4.2 Resource management	EFISC-GTP (4.2 Resource	
	management)	
4.2.1 Provision of resources	EFISC-GTP (4.2.1 Provision of	
	resources)	
4.2.2 Human resources	EFISC-GTP (4.2.2 Human resources)	
4.2.2.1 Organisational chart	EFISC-GTP (4.2.2.1 Organisational	
	chart)	
4.2.2.2 Competency, awareness and	EFISC-GTP (4.2.2.2 Competency,	
education	awareness and education)	



4.2.2.3 Personnel hygiene	EFISC-GTP (4.2.2.3 Personal	
1.2.2.3 i ci somici mygiciic	hygiene)	
4.2.3 Infrastructure and work	EFISC-GTP (4.2.3 Infrastructure and	
environment	work environment)	
4.2.3.1 Basic requirements	EFISC-GTP (4.2.3.1 Basic	
	requirements)	
4.2.3.2 Requirements for loading,	EFISC-GTP (4.2.3.2 Requirements	
storage, production areas and other	for loading, storage, production	
feed material related facilities	areas and other feed/food	
	ingredient related facilities)	
4.2.3.3 Equipment	EFISC-GTP (4.2.3.3 Equipment)	
4.2.4 Control of monitoring,	EFISC-GTP (4.2.4 Control of	
measuring and dosing devices	monitoring, measuring and dosing	
č č	devices)	
4.2.5 Maintenance	EFISC-GTP (4.2.5 Maintenance)	
4.2.6 Cleaning, disinfection and	EFISC-GTP (4.2.6 Cleaning,	
sanitation	disinfection and sanitation)	
4.2.7 Pest control	EFISC-GTP (4.2.7 Pest control)	
4.2.8 Waste control	EFISC-GTP (4.2.8 Waste control)	
4.2.9 Water, steam and air supply	EFISC-GTP (4.2.9 Water, steam and	
	air supply)	
4.3 Operational rules	EFISC-GTP (4.3 Operational rules)	
4.3.1 General	EFISC-GTP (4.3.1 General)	
4.3.2 Incoming material		
requirements	EFISC-GTP (4.3.1.2 Incoming	
4.3.2.1 Processing aids and additives	materials requirements)	
for production of feed materials	,	
4.3.2.2 Gatekeeper protocol	EFISC-GTP (4.3.1.4 Gatekeeper	New procedure
(processing aids, additives from non-	protocol)	
assured source)		
4.3.3 Handling of incoming materials	EFISC-GTP (4.3.2 Handling of	
0	incoming materials)	
4.3.4 Measures for the prevention	EFISC-GTP (4.3.3 Measures for the	
of cross contamination	prevention of cross contamination)	
4.3.5 Measures for the prevention	EFISC-GTP (4.3.4 Measures for the	
of contamination	prevention of contamination)	
	EFISC-GTP (4.3.4.1 Glass policy)	New procedure
4.3.6 Processing aids and	EFISC-GTP (4.3.5 Processing aids	
Technological Additives	and Technological Additives)	
4.3.7 Rework	EFISC-GTP (4.3.6 Rework)	
4.3.8 Production of feed materials	EFISC-GTP (4.3.7 Production and	
	handling of feed/food ingredients)	
4.3.9 Finished feed materials	EFISC-GTP (4.3.8 Delivery of	
	feed/food ingredients – labelling	
	and accompanying documents)	
	EFISC-GTP (4.3.9 The handling of	New procedure
	non-certified feed/food and non-	
	feed/food ingredients in collection,	
	trade, storage and transport)	
4.3.10 Storage	EFISC-GTP (4.3.10 Storage)	



4.3.11 Transport	EFISC-GTP (4.3.11 Transport)	
4.3.11.1 General transport	EFISC-GTP (4.3.11.1 General	
requirements	transport requirements)	
4.3.11.2 Transport operation packed	EFISC-GTP (4.3.11.2 Transport	
feed materials	operation packed feed/food	
reca materials	ingredients)	
4.3.11.3 Transport operation bulk	EFISC-GTP (4.3.11.3 Transport	
feed materials	operation bulk feed/food	
recu materials	ingredients	
4.3.11.4 Transport by road	EFISC-GTP (4.3.11.4 Transport by	
4.5.11.4 Transport by Toda	road)	
4.3.11.5 Inspection on loading of	EFISC-GTP (4.3.11.6 Inspection on	
water borne- and rail transport	loading of water borne- and rail	
111	transport)	
4.3.12 Product and process	EFISC-GTP (4.3.12 Product and	
development	process development)	
•	EFISC-GTP (4.3.13 Sales)	
4.4 Management system	EFISC-GTP (4.4 Management	
components	system components)	
4.4.1 Documentation requirements	EFISC-GTP (4.4.1 Documentation	
	requirements)	
4.4.2 Traceability	EFISC-GTP (4.4.2 Traceability)	
4.4.3 Inspection, sampling and	EFISC-GTP (4.4.3 Inspection,	
analysis	sampling and analysis)	
4.4.3.1 Sampling	EFISC-GTP (4.4.3.1 Sampling)	
4.4.3.2 Frequency of analysis	EFISC-GTP (4.4.3.2 Frequency of	
, , ,	analysis)	
4.4.3.3 Laboratory and methods	EFISC-GTP (4.4.3.3 Laboratory and	
,	methods); Table 1. EFISC-GTP flow	
	diagram monitoring scope D	
4.4.4 Control of non-conforming	EFISC-GTP (4.4.4 Control of non-	
product	conforming product)	
4.4.5 Crisis management –	EFISC-GTP (4.4.5 Crisis	
withdrawal and recall for safety	management – withdrawal and	
reason	recall for safety reason)	
4.4.6 internal audits	EFISC-GTP (4.4.6 internal audits)	
4.5 Supplier and customer	EFISC-GTP (4.5 Supplier and	
relationship	customer relationship)	
4.5.1 Supplier relationship	EFISC-GTP (4.5.1 Supplier	
	relationship)	
4.5.2 Customer relationship	EFISC-GTP (4.5.2 Customer	
·	relationship)	
	EFISC-GTP (4.6 Feed/Food Fraud	New procedure
	Vulnerability Assessment)	
5 Prerequisite programmes	EFISC-GTP (5 Prerequisite	
	programmes)	
5.1 Construction and lay-out of the	EFISC-GTP (5.1 Construction and	
building	lay-out of the building – see	
	4.2.3.2)	
5.2 Lay-out of premises and	EFISC-GTP (5.2 Lay-out of premises	
workspace	and workspace – see 4.2.3.3)	
· · · · · · · · · · · · · · · · · · ·		ı



5.3 Utilities	EFISC-GTP (5.3 Utilities – see
5.5 othices	4.2.3.3)
5.4 Waste disposal	EFISC-GTP (5.4 Waste disposal –
5.4 Waste disposal	see 4.2.8)
5.5 Equipment, cleaning and	EFISC-GTP (5.5 Equipment, cleaning
maintenance	and maintenance – see 4.2.3.4)
	EFISC-GTP (5.6 Management of
5.6 Management of incoming materials	
materials	incoming materials – see 4.3.3;
F 7 Massures for the provention of	4.5.1)
5.7 Measures for the prevention of contamination	EFISC-GTP (5.7 Measures for the
Contamination	prevention of contamination – see 4.3.4)
F. O. Classing and conitation	,
5.8 Cleaning and sanitation	EFISC-GTP (5.8 Cleaning and
C O Doot courtural	sanitation – see 4.2.6)
5.9 Pest control	EFISC-GTP (5.9 Pest control – see
5.40 Damarral having	4.2.7)
5.10 Personnel hygiene	EFISC-GTP (5.10 Personal hygiene –
- 16 Hill	see 4.2.2.3)
5.11 Personnel facilities	EFISC-GTP (5.11 Personal facilities –
	see 4.2.2.3)
5.12 Rework	EFISC-GTP (5.12 Rework – see
	4.3.5)
5.13 Product withdrawal and recall	EFISC-GTP (5.13 Product
	withdrawal and recall – see 4.4.4
	and 4.4.5)
5.14 Storage	EFISC-GTP (5.14 Storage -see
	4.3.10)
5.15 Transportation	EFISC-GTP (5.15 Transportation –
	see 4.3.11)
5.16 Training and supervision of	EFISC-GTP (5.17 Training and
personnel	supervision of personnel – see
	4.2.2.2)
5.17 Product information	EFISC-GTP (5.18 Product
	information – see 6.4)
5.18 Food defence, biovigilance and	EFISC-GTP (5.19 Feed defense,
bioterrorism	biovigilance and bioterrorism – see
	4.1 and 4.2.3.2)
6 HACCP system	EFISC-GTP (HACCP system)
6.1 General introduction	EFISC-GTP (6.1 General
	introduction)
6.2 General requirements	EFISC-GTP (6.2 General
	requirements)
6.3 HACCP-team and team leader	EFISC-GTP (6.3 HACCP-team and
	team leader)
6.4 Incoming material and feed	EFISC-GTP (6.4 Incoming material
material specifications	and feed/food material
	specifications
6.5 Process information	EFISC-GTP (6.5 Process
	information)
6.6 Hazard analysis	EFISC-GTP (6.6 Hazard analysis)
6.7 Risk assessment	EFISC-GTP (6.7 Risk assessment)



6.8 Selection and assessment of	EFISC-GTP (6.8 Selection and	
	assessment of control measures)	
control measures	,	
6.9 Establishing the operational	EFISC-GTP (6.9 Establishing the	
prerequisite programmes (OPRP's)	operational prerequisite	
	programmes (OPRP's))	
6.10 Establishing the HACCP plan	EFISC-GTP (6.10 Establishing the	
	HACCP plan)	
6.11 Critical limits, performance	EFISC-GTP (6.11 Critical limits and	
standard and monitoring	monitoring)	
6.12 Correction	EFISC-GTP (6.12 Correction)	
6.13 Validation of the feed safety	EFISC-GTP (6.13 Validation of the	
management system	feed/food safety management	
	system	
6.14 Verification of the feed safety	EFISC-GTP (6.14 Verification of the	
management system	feed/food safety management	
	system)	
7 REFERENCE DOCUMENTS	EFISC-GTP (REFERENCE	
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8 SECTOR REFERENCE DOCUMENTS	EFISC-GTP (SECTOR REFERENCE	
	DOCUMENTS)	
APPENDIX 1: Stakeholder	EFISC-GTP (APPENDIX 1:	
consultation	Stakeholder consultation)	
APPENDIX 2: List of Acronyms and	EFISC-GTP (APPENDIX 2: List of	
abbreviations	Acronyms and abbreviations)	
APPENDIX 3: Sector reference	STARCH S.D.	
document on the manufacturing of	37/Mer 3.5.	
safe feed materials from starch		
processing		
APPENDIX 4: Sector reference	FEDIOL S.D.	
document on the manufacturing of	1251023.5.	
safe feed materials from oilseed		
crushing and vegetable oil refining		
APPENDIX 5: Sector reference	EBB S.D.	
	LDD 3.D.	
document on the manufacturing of safe feed materials from Biodiesel		
processing		



3. Table to be used by Certification Bodies

GTP Rules of Certification (RoC)	Where to find on EFISC-GTP 4.0 Rules of Certification (RoC)			
1. Audit scope of the GTP Code	1.1 General information			
	1.2 EFISC-GTP Terms of Reference			
2. General requirements				
3. Rules and responsibilities of COCERAL	SECTION 2 EFISC-GTP AisbI RULES AND RESPONSIBILITIES			
4. Assessment and approval of Certification Bodies	2.1 Assessment and approval of Certification Bodies			
4.1 Requirements for Certification Bodies	3.1.1 Requirements for Certification Bodies			
4.2 Approval of Certification Bodies	3.1.2 Requirements for the certification body quality management system			
5 Training, management and coordination of certification Bodies	3.1.3.2 Annual training, audit experience and evaluation			
6. Selection and mission of auditors	3.1.3.1 initial approval of the auditor			
7. Audit preparation	7.1.7 Evaluation of compliance with EFISC GTP			
8 Evaluation of compliance with GTP	7.1.8 Non-conformities			
9 Final discussion and conclusion	7.1.9 Final discussion and conclusion			
10 Requirements in terms of assessment – Duration and frequency of audits	7.1.3 Determination of audit time			
11 Requirements in terms of audits report	7.1.11 Audit report			
12 Decision requirements				
12.1 Certification Board	SECTION 2 EFISC GTP Aisbl RULES AND RESPONSIBILITY			
12.2 Certificate				
13 Requirements in terms of Certificate	Section 9 Certificate			
13.1 Certificates				
13.2 Withdrawal of certificates	9.1 Withdrawal of Certificates			
13.3 Expiring Certificates	9.2 Expiring Certificates			
13.4 Exclusion of certificates	9.3 Exclusion of certificates			
13.5 Use of GTP Logo	9.4 Use of EFISC-GTP Logo			
14 Publication of the certification decision	7.1.11 Audit report			
15 Rules of Sanction Procedure				
15.1 General				
15.2 Certificate Suspension and withdrawn	9.1 Withdrawal of Certificates 7.1.10 The consequences on nonconformities			
15.3 Appeals	·			
16 Financial conditions	ANNEX 1 Fee system			
Annex 1 Multisite certification	7.1.1 Multi-site certification			
Annex 2 AUDIT REPORT FORMAT	Annex 4 MODEL OF AUDIT REPORT			
Annex 3 Audit duration formula	7.1.3 Determination of audit time			
Annex 4 Examples of impartiality statement				
Annex 5 Assessment form for operators				



4. Novelty for both EFISC and GTP companies

4.1 Q&A on company certification requirements according the new EFISC- GTP Code

See document titled "<u>Transition quide for the conversion of v3.1 EFISC and v1.3A GTP code to v4.0</u>
<u>EFISC-GTP scheme</u>", paragraph 4

<u>Q&A:</u>

 $\underline{\mathbf{Q}}$: For a new operator applying for the new code, when will it be possible to be certified EFISC-GTP with an accredited certificate?

<u>A</u>: According to the "Transition guide for the conversion of v3.1 EFISC and v1.3A GTP code to v4.0 EFISC-GTP scheme", there will be 2 periods:

- A-B: Accreditation Period
- B-C: Certification period.

According to the table 1 in the same document, each CB has to make (during the period A-B) an audit, witnessed by its Accreditation Body, in order to get the accreditation. It will be up to the Accreditation Body to decide how many witness audits will be needed in order for the CB to get the accreditation. Let's assume (as example) 1 witness audit: in such case, in the period A-B, each CB should organize an audit (according to the new code) witnessed by the Accreditation Body, in one of the EFISC-GTP company. Of course, this audit (witnessed by the Accreditation body) will "produce" a non-accredited certificate (because the CB will receive the accreditation AFTER the witness audit). Accreditation documents from the CBs, will be published on the EFISC-GTP web site. The accreditation period of the CBs MUST terminate before the deadline for accreditation (point B in the graph). After the accreditation period (A-B), all the CBs will be accredited, so from that moment on the accredited CB will be able to deliver accredited certificates. So, the answer is:

- In the EFISC-GTP website, documents related to the accreditation against the new code will be published;
- If the audit of the new company will be carried out after the accreditation of the CB, you will receive an accredited certificate.
- 4.2 Handling of non-certified feed/food and non-feed/food ingredients in collection, trade, storage and transport (negative labelling)

GTP code:

3.4.1.2 The layout of the storage and handling premises and galleries

A. Prevention of cross contamination. The operator must ensure that layout of the storage and handling premises and galleries: - Prevents the mixing of GTP or equivalent/recognised schemes with non-assured

EFISC-GTP Code (paragraph 4.3.9):

An operator handling different applications (feed/food /technical, certified/non certified) should ensure the strict segregation of lots with different applications to avoid contamination in line with (General Food Law Regulation 178/2002, Feed hygiene Regulation 183/2005), the EFISC-GTP Code and ISO/TS 22003:2013 § 9.1. In case of



goods. If non-assured materials come in contact with GTP or GTP equivalent/recognised schemes assured materials, then the whole batch is non-assured and must be recorded by the operator in possession of the goods (see the list of schemes at the end of the Code).

3.2.5 Labelling and accompanying documents
Each movement of goods must be accompanied by
appropriate documentation including at least:

- The names and addresses of the supplier and the customer
- The date and place of dispatch
- The nature and type of goods
- The quantity loaded / delivered The operator must ensure that labelling meets legal requirements (Regulation (EC) No 767/2009 on the marketing and use of feed; Directive 2000/13/EC on the labelling, presentation and advertising of foodstuffs).
- 3.2.7 Goods with specific regulations Management rules for goods with specific regulations must be defined and implemented in compliance with the legislation in force. In case of co-existence of goods with specific regulations and other goods, the operator must: - Make the staff aware of the technical and administrative specifications of the goods - Keep specific accounting records for the stored goods - Organise any certification needed and record the certificates - Communicate relevant information to the concerned parties - Provide and establish procedures for specific labelling and accompanying documents - Keep a clear physical separation, which must be documented. 36 The management rules must include in the purchasing information the requirement for the absence of GMO non-authorised in the EU in the purchasing information. In case the incoming material comes from a country or region with a risk of comingling with non EU-authorised GMOs the management must apply the appropriate analytical monitoring, based on a risk assessment. In the event of delivery of goods, within the scope and boundaries of the operator's GTP certification, to GTP certified customers or to customers who are certified against another certification scheme which has been declared to be equivalent to the GTP Code, the

contamination the batch of product will be downgraded accordingly. The operator's feed/food safety management system shall ensure a physical and/or organisational segregation between certified and non – certified feed ingredients, feed/food and non – feed /food in order to avoid ccontamination, based on a risk assessment. The management shall:

- a. Provide a suitable infrastructure at the location, allowing to handle the segregation of goods
- b. The different stages of product handling and service provision shall be carried out according to written procedures aimed at defining, controlling and monitoring the critical points for contamination in the process and to guarantee segregation between tanks and silo's with different applications.
- c. A procedure to register all the incoming feed/food/technical materials- see § 4.3.3
- d. Proper labelling of the product should prevent mistakes like unwanted mingling or wrong labelling.
- e. A traceability system as described in § 4.4.2
- f. The processes/product handling will be documented and the documentation available
- g. Effectiveness of the measures will be controlled.
- h. Communication to the customer by clear labelling (See §4.3.9 finished product).
- In case the product in not covered under the EFISC-GTP certification the certification status of the product will be indicated in the sales contract and/or invoice and/or on the label by batch (negative labelling) Example "This feed/ food ingredient is not covered under the EFISC – GTP certification".



status of goods from non GTP or non GTP equivalent certification need to be mentioned in contracts or, by default, on some other written form by the time of delivery.

Q&A:

 $\underline{\mathbf{Q}}$: Negative labelling is a new requirement for GTP certification, but can GTP companies use in parallel also positive labelling?

<u>A</u>: Besides negative labelling ('this is not a GTP certified product'), a GTP-certified company is allowed to use positive labelling ('this is an EFISC-GTP certified product') for commercial reasons.

4.3 Feed/Food Fraud Vulnerability Assessment

GTP code:

Not applicable

EFISC-GTP Code:

4.6 Feed/Food Fraud Vulnerability Assessment

The operator shall have a documented Feed/Food Fraud Vulnerability Assessment in place to identify and address possible feed/food fraud vulnerabilities and prioritise feed/food fraud mitigation measures based on a risk assessment. The operator shall have a documented plan in place that specifies the measures the organisation has implemented to mitigate the feed/food safety from the identified feed/food fraud vulnerabilities. The operator feed/food fraud mitigation plan shall cover the relevant feed/food scope and shall be supported by the operator's Feed Safety Management System. The assessment shall take into account: The possible feed/food fraud opportunities- the product and process characteristics, features of the chain/industry network, and historical evidence of fraud with particular feed/food products and ingredients the possible motivation- the organizational aspects such as business culture, historical offenses, and economic conditions of the company, suppliers and customers. The possible control- the possible mitigation and contingency control measures. The team shall make the assessment of the selected ingredient /product /product group/unit and, where applicable, the major direct suppliers associated with its activity. Based on the outcome of the assessment the operator shall define the mitigation and contingency control measures. Feed/food fraud vulnerabilities are dynamic and may change over time. Therefore, the assessment has to be made at regular interval. The



risk assessment and its findings will be part of the operators internal audit and annual review as described in §4.6 and §4.1.3.

For the assessment the operator can make use of the food fraud vulnerability assessment tool as developed and <u>published by SSAFE and PWC</u>. A team will be composed with the specific knowledge and skills related to the Feed/Food Fraud Vulnerability Assessment. The SSAFE and PWC assessment tool consists in 50 questions covering the 3 following sections: opportunities, motivations and control measures.

Q&A:

4.4 Multi-site certification

GTP code:

Introduction

The following rules are meant to cover the certification of management systems in organisations with a network of sites spread out in a vast geographical area. They aim at ensuring that the audit provides adequate confidence that the operator complies with the scheme requirements while taking into account practical and economic considerations related to the specificities of certain operators such as collectors and storekeepers with numerous sites.

Scope and bounderies

These rules apply to operators holding a multisite organisation, being a unique legal entity or not, where all sites shall have a legal or contractual link with the central office of the operator and be subject to a common management system which is laid down, established and subject to surveillance and internal audits by the central office. Trading companies where no physical handling of food/feed materials takes place are not part of the scope of this annex 1. This means that the central office has rights to require that the sites implement corrective actions when needed in any site. Where applicable this should be set out in a formal agreement between the central office and the sites. The central office must be registered as per Regulation (EC) No 183/2005, Regulation (EC) No 852/2004, or equivalent. These rules shall however not be used if

EFISC-GTP paragraph 7.1.1 RoC:

7.1.1 Multi-site certification

Multi-site certification is not permitted under the scope D (Animal Feed production). Multi-site certification is permitted under the scope F (Distribution) and G (Provision of transport and storage services). See reference ISO/TS 22003:2013 Table A.

1 7.1.1.1 Requirements for multi-site certification
Under the scope F and G The following requirements
are meant to cover the certification of management
systems in organisations with a network of sites
spread out in a vast geographical area. They aim at
ensuring that the audit provides adequate confidence
that the operator complies with the scheme
requirements while taking into account practical and
economic considerations related to the specificities
of certain operators such as collectors and
storekeepers with numerous sites. EFISC.GTP
considers the EU internal market as one geographical

7.1.1.2 Scope and boundaries

These requirements apply to operators holding a multisite organization, being a unique legal entity or not, where all sites shall have a legal or contractual link with the central office of the operator and be subject to a common Feed/Food Safety Management System which is laid down, established, controlled and subject to surveillance and internal audits by the central office. This means that the central office has



various independent companies have joined together in a branch organisation, union, federation, or association.

General requirements

The operators in compliance with the scope of application of these multisite certification rules shall ascertain that:

- all sites are of the same activity and are located within the same country combined with the bordering regions of neighboring countries, where relevant;
- all sites are operating under one centrally controlled and administered food/feed safety management system;
- an internal audit is carried out annually on each site; The use of multisite sampling is possible for organisations with a central office and at least 1 additional site based on the following combination of external and internal audits.

A. External audits

On the basis of a sampling program, the GTP auditor appointed by a Certification Body approved by COCERAL must randomly select the sites to be audited according to the following rules:

- For organisations with a range of sites between 2 and 20, all these sites must be audited within the three-year certification period.
- For organisations with more than 20 sites, the sampling shall be at the ratio of 1 site per 5 sites with a minimum of 20 within the three-year certification period. The sampled sites to be audited during the certification period must be equally divided along the three years period. The selection of sites is of the responsibility of the Certification Body and its GTP auditor and must take into account the geographical criteria so as to reduce journeys from one site to the other, thus reducing costs for the operators. After the audit, no sampled sites must be non-conforming. Audit findings of the sampled sites must be considered indicative of the entire system and correction must be implemented accordingly. This does not preclude the obligation for the Certification Body to audit every 12 months the central office of the operator who has been granted a multisite certification.

B. Internal audits

All sites, including the central office, must be internally audited every year by a competent staff

rights to require that the sites implement corrective actions when needed in any site. This should be set out in a formal agreement between the central office and the sites.

7.1.1.3 General requirements

The operators in compliance with the scope of application of these multisite certification rules shall ascertain that:

- At least annually an audit for the central office for the FSMS (including PRP, OPRP, HACCP, other in line with the EFISC.GTP Code and relevant sector document) shall be performed
- All sites are of the same activity and are located within the same country or economic zone (EU internal market)
- All sites are operating under one centrally controlled and administered FSMS;
- An internal audit is carried out annually on each site;
- The certification body shall provide an audit report for each site audited.

The use of multisite certification is possible for organisations with a central office and at least 20 additional sites based on the following combination of external and internal audits.

A. External audits

On the basis of a sampling program, the certification body must randomly select the sites to be audited according to the following rules:

- For organisations with additional sites between 1-20, 1/3 of the sites will be audited annually. All sites will be audited within the three year audit cycle.
- For organisations with more than 20 sites, the sampling shall be at the ratio of 1 site per 5 sites with a minimum of 20 within the three-year certification period. The sampled sites to be audited during the certification period must be equally divided along the three years period. The selection of sites is of the responsibility of the Certification Body and must take into account the geographical criteria so as to reduce journeys from one site to the other, thus reducing costs for the operators. After the audit, no sampled sites must be non-conforming. Audit findings of the sampled sites must be considered indicative of the entire system and correction must be implemented accordingly. This does not preclude the obligation for the Certification Body to audit every 12 months the central office of the operator who has been granted a



member of the operator (e.g. quality manager, site manager or other company representative). The planning for internal audits as well as the results of such audits must be documented. The internal audit reporting must be drawn up in such a way that the Certification Body can make use of this information when auditing the central office.

The certified operator which is registered on the public list must pay to the recognised Certification Body the following GTP fees which vary according to the number of sites included into the scope of the GTP certification.

Number of sites	1	2-20	21-49	50-99	100-199	> 200
GTP certification fees	€ 350	€ 400	€ 450	€ 500	€ 550	€ 600

multisite certification. In the following table the new fees:

Multisite certification, only for scope F and G: Total fee = Basic fee + (Additional fee x number of sites)

Where:

Number of sites	1	2-10	11-39	40-79	>80
Basic fee	350	320	300	280	260
Additional fee	0	35	35	35	35

Q&A:

4.5. Unannounced audit programme (new for GTP companies)

GTP code:

Not applicable

EFISC-GTP Code:

b) Unannounced audit programme

The EFISC.GTP unannounced audit will take place without notice in addition to the annual announced audit in the three year certification cycle as described in ISO/IEC 17021-1:2015 and this document. The inspection will focus on GMP and GHP practices. All EFISC-GTP certified operators will participate in the unannounced audit programme. However there are two options.

a) Random (R)

The operator might receive one unannounced audit in the three year audit cycle. The Certification Body will randomly select around 5 % of the certified operator(s) annually and implement the necessary unannounced audits (5% in addition to operators participating in the mandatory unannounced audit programme).

b) Mandatory (M)

Unannounced audit programme for suppliers to QS and FCA certified customers. The operator will receive one unannounced audit in the three year audit cycle. QS and FCA require feed ingredient producers to have one unannounced audit in the three years as a pre-condition in order to be eligible to deliver into the scheme. The EFISC certified operator delivering into the QS and FCA scheme will arrange as such with the certification body. The certification body will inform EFISC on the participation of the operator in the mandatory unannounced audit programme. The participation of



the operator in the in the unannounced audit programme will be indicated in the EFISC certification database (R or M). The unannounced audit shall not take place in the period between two months before and two months after the annual audit. The unannounced audit will take place during normal working hours.

The operator may in principle not refuse the unannounced audit. However, in an exceptional situation of a factory shut down or the absence of staff to accompany the auditor, the operator could refuse and postpone the unannounced audit. In such a situation the operator will provide a valid and documented motivation (3)

The unannounced audit time is minimum 4 hours, including reporting time (The reporting time is max. 25% of the time). The operator can indicate in advance to the Certification Body blackout dates for legitimate reasons (i.e. shut down, seasonal, etc) in the year that the audit cannot take place. The outcome of the unannounced audit will be handled in accordance with the requirements described in Section 7 and especially §7.1.10 Follow-up of nonconformities and their closure. The EFISC-GTP unannounced audit (random or mandatory) will be covered in the contractual arrangement between the operator and the Certification Body. The cost for the unannounced audit and possible follow- up in case of non- conformities will be paid by the operator. The participation of the operator in the unannounced audit programme (R or M) will be indicated on the public EFISC-GTP database for certified operators. The effectiveness of the unannounced audit programme will be evaluated annually.

(3) ¹ For Category G and F, the operator will be informed by the certification body two working days in advance in order to organise entrance and guidance through the facility. The starting time will be agreed on. The CB will provide the personal information on the auditor arriving for the audit to the operator. In a situation where more traveling time is required and/or visa applications, the two days can be extended to the minimum workable time.

Q&A:

4.6 Crisis management

3.1.11 Crisis management – Withdrawal and recall for safety reasons

4.4.5 Crisis management – withdrawal and recall for safety reasons



The management must implement a documented recall procedure that ensures customers, regulatory authorities and the concerned certification body can be informed promptly in the event of any irregularity that may adversely affect food and feed materials safety. This will ensure that if product recall is needed it can be instigated in a quick and timely manner. If the management considers or has reason to believe that a food or feed material which it has collected, stored, delivered, traded or transported does not satisfy the food or feed safety requirements it must immediately initiate procedures to withdraw and if necessary, recall from users of the food or feed material this latter from the market and inform the competent authorities thereof:
¬ The withdrawal and recall procedure must be documented — Responsibility must be defined for notifying customers and regulatory authorities — Responsibility within the operation for product withdrawal and recall(s) must be defined ¬ All relevant contacts (including relevant authorities) must be listed and kept up-todate. This is not generally the responsibility of the storekeeper, it is for the storekeeper to notify the owner of the goods only. However, the method and authority for the recall of goods may be given where authorized. Food and feed materials which are considered unsafe will be handled as non-conforming product. Yearly, the recall procedure must be tested by a simulation to ensure its validity. Above must all make regard to the HACCP Plan.

The management shall implement a documented withdrawal and recall procedure that ensures customers and regulatory authorities can be informed promptly in the event of any irregularity that may adversely affect feed/food ingredient safety in line with Reg. 178/2002/EC art. 20. Furthermore the management shall inform the certification body of any food safety prosecution, significant regulatory food safety non-conformity or any product recall relating to feed/ food safety. If the management considers or has reason to believe that a feed/food ingredient which it has collected, stored, delivered, produced, processed, manufactured, traded or transported does not satisfy the feed/food safety requirements it shall immediately initiate procedures to withdraw and if necessary, recall from users of the feed/food ingredient, the feed/food in question from the market and inform the competent authorities thereof. The business operator shall: a) The withdrawal and recall procedure shall be documented. EFISC•GTP Code to good practice for the collection, transport, trading, storage and industrial manufacture of safe feed/food ingredients version 4.0 Page 43 of 65 b) Responsibility shall be defined for notifying customers and regulatory authorities. c) Responsibility within the operation for product withdrawal and recall(s) shall be defined. d) A crisis contact will be available 7/24. e) All relevant contacts (including relevant authorities) shall be listed and kept up-to-date. f) The certification body and EFISC.GTP shall be informed about the situation without delay. g) Allow the Certification Body to perform a short notice audit in order to evaluate the situation and take appropriate action. Feed/food ingredients which are considered unsafe will be handled as non-conforming product (See §4.4.4). Yearly the recall procedure shall be tested by a simulation to ensure its validity.

See the <u>EFISC-GTP incident and crisis procedure</u> for further requirements.

Q&A:



4.7 Audit time calculation

GTP Rules of Certification - ANNEX 3: Calculation formula for the average audit duration

Calculation criteria The criteria for the calculation of the average audit duration which must be taken into account:

- The number of major silos that were sampled such as the registered office, the dryer or main storage long duration (A)
- The number of secondary* silos that were sampled (B)
- The average time for visiting a major silo (C)
- The average duration of a documentary audit according to the average staff of the operator (D)
- The already existing certifications (as referred to in Appendix 6 of the GTP code) that were taken into account (E)

*A silo is considered secondary when it has no permanent staff and has restricted opening period.

The number of sampled silos is calculated in compliance with the sampling rules laid down in Annex 1.

Indicative elements for calculation

Indicative elements for calculation

Average time for visiting a major site (C)	0,5 day
Average duration of documentary	
audit according to the staff (D)	
1 to 30 persons	0,25 day
more than 30 persons	0,5 day
Reduction percentage in case of already existing equivalent/recognised certifications (E) of quality management as referred to in Appendix 6 of the GTP code	25%
Reduction percentage in case of already verified items of food and feed safety standards in full compliance with the items of the GTP audit checklist	At least 80% item by item in conformity with GTP

Calculation formula for the average audit duration

Average duration = [(A + B/2) * C + D] * (1 - E)The result is expressed in days of audit, rounded up to the nearest half day.

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7.1.3 Determination of audit time

Audit duration is dependent on the number of parallel processes to be audited at the same location within the scope of the FSMS to be certified. One audit day is 8 hours. Auditor time stated does not include reporting. Reporting time is to be agreed between the operator and the CB. Typically reporting time is 0.5 day per site but can vary depending of the size, complexity and audit combinations.

Initial certification, re-certification, surveillance audits and unannounced audits may be combined with audits of other management systems. The defined audit time will ensure the effectiveness and depth of the assessment of the FSMS, GMP, GHP, HACCP and PRP in compliance with the requirements in the EFISC.GTP Code and the relevant sector document.

Depending of the complexity of the products and or processes and the number of FTE (full time equivalents)/ employees involved in feed/food ingredient related activities as well as the possible previous audit results the certification body defines the audit time together with the operator. When an organisation deploys workers in shifts and the products and/or processes are similar, the FTE number will be calculated based on employees on the main shift (including seasonal workers) plus feed/food safety related office workers. When properly documented and justified, a reduction can be made for a less complex organisation measured by number of employees, size of the organisation and/or product volume or within categories having a basic audit time of less than 1.5 day audit time EFISC.GTP.

A HACCP study corresponds to a hazard analysis for a family of products /services with similar hazards and similar production technology and, where relevant, similar storage technology. If the scope of one specific operator covers more than one category, the audit time calculation shall be taken from the highest recommended basic audit time. Additional time is required for each HACCP study.



Initial audit:

An initial audit takes place at the location of an applicant seeking certification against the EFISC.GTP Code. It should be carried out by checking the whole sections of the EFISC.GTP Code. See table §7.1.4 Minimum initial audit and recertification audit time for the relevant scope and time calculation.

Surveillance audit: A surveillance audit is a periodical audit performed to ensure that an organization still meets EFISC.GTP requirements. Depending on the previous audit results as well as the complexity of the products and or processes the CB defines the audit time together with the operator. The auditor ensures to address all EFISC.GTP requirements during the total of the two surveillance audits. Typical audit time for surveillance visits is set on 75 % of the initial audit time with a minimum of 1 audit day See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation

Re- certification audit: A re- certification audit takes place at the end of a certification period. The audit must be planned in due time in order to avoid expiration of the certificate. It should be carried out by checking all sections of the EFISC.GTP Code. Audit time for renewal of the certificate is identical to an initial audit. See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation

Special audits: It may be necessary that an audit is conducted by the certification body at short notice, in the following cases: 1. If the operator is involved in an feed/food safety incident 2. Follow up of the audit which is listed on the EFISC.GTP website under review It is the responsibility of the Certifying Body to increase the audit time if the complexity of processes or the auditee's organisation calls for this.

Unannounced audits Typical audit duration for an unannounced audit is 4 hours, including reporting. EFISC.GTP – Rules of Certification version 4.0 27 The operator can indicate up to 15 days in the year that the audit cannot take place. The days should be used when the site is not in production. The unannounced audit will take place during week days.



Minimum initial audit and re-certification audit time (EFISC-GTP)

Basic calculation of minimum initial certification audit time (Ts)

Ts = (D + H + FTE + S)

D=Basic audit time

H=Additional audit time

FTE=Number of employees involved in feed/food ingredients related activities

S=Special (for instance fraud assessment)

7.1.4.1 Scope D Animal Feed Production

	D Basic audit time (1 process lines/HACCP- study)	H Additional audit time Number of lines/HACCP- studies	FTE Number of employees involved in feed ingredient related activities (additional audit time)	Deductible audit time in case of a combined audit with a valid version of GMP plus, Femas, FCA, QS for the scope production of feed ingredients	in case of a combined audit with a valid version of ISO 22000,
Main office (purchase and/ or sales*1 department)	1 day	0.5 day per additional HACCP-study	1 to 19=0 20 to 49=0.5 50 to 79=1.0 80 to 199=1.5 200 to 499=2.0 500 to 899=2.5		Reduction of 50 % with the restriction that the audit duration of the combined audit equals to 50 % EFISC.GTP time + FC time. The minimum time for a combined audit cannot be less than 1 day
Main office (purchase and/ or sales* department), including production site	1.5 day	0.5 day per additional HACCP-study			Reduction of 50 % with the restriction that the audit duration of the combined audit equals to 50 % EFISC.GTP time + FC time. The minimum time for a combined audit cannot be less than 2.0 day
Production site	1,5 day	0.5 day per additional HACCP-study		Reduction of75% with the restriction that the audit duration of the combined audit equals to the minimum time for a single EFISC.GTP audit (combined audit time minimum 1.5 day)	Reduction of 50 % with the restriction that the audit duration of the combined audit equals to 50 % EFISC.GTP time + FC time. The minimum time for a combined audit cannot be less than minimum 1,5 day

^{*1(}Intercompany) purchasing and (intercompany) sales of EFISC.GTP certified feed/food ingredients



7.1.4.2 Scope F Distribution

The audit time for each site is calculated in line with the table below.

	Basic audit time (1 process lines/HACCP-	H Additional audit time Number of lines/HACCP- studies	FTE Number of employees involved in feed/food ingredient related activities (additional audit time)	version of GMP	audit time in case of a combined audit with a valid version of ISO	For each additional site visited
Distribution, feed/food broking, trading		0.5 day per additional HACCP-study	80 to 199=1.5 200 to 499=2.0 500 to 899=2.5	the audit duration of the combined audit equals to the minimum time for a single EFISC.GTP audit(combined audit time	% with the restriction that	50% of minimum on- site audit time

7.1.4.2 Scope G Provision of storage and transport services

The audit time for each site is calculated in line with the table below.

	Basic audit time (1 process lines/HACCP-	H Additional audit time Number of lines/HACCP- studies	activities	version of GMP	audit time in case of a combined audit with a valid version of ISO	For each additional site visited
Storage and transport		0.25 day per additional HACCP-study	80 to 199=1.5 200 to 499=2.0 500 to 899=2.5	with the restriction that the audit duration of the combined audit equals to the minimum time for a single EFISC.GTP audit(combined audit time	% with the restriction that	50% of minimum on- site audit time

For category G and F, the following rule applies:

When properly documented and justified, a reduction can be made for a less complex organisation measured by number of employees, size of the organisation and/or product volume or within categories having a basic audit time of less than 1.5 day audit time.

Q&A:	