



Procedure Benchmark GMP+

GMP+ D 1.1

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GMP+ Feed Certification scheme



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1 INTRODUCTION

1.1 General

The GMP+ Feed Certification scheme was initiated and developed in 1992 by the Dutch feed industry in response to various more or less serious incidents involving contamination in feed materials. Although it started as a national scheme, it has developed to become an international scheme that is managed by GMP+ International in collaboration with various international stakeholders.

Even though the GMP+ Feed Certification scheme originated from a feed safety perspective, in 2013 the first feed responsibility standard has been published. For this purpose, two modules are created: GMP+ Feed Safety Assurance (focussed on feed safety) and GMP+ Feed Responsibility Assurance (focussed on responsible feed).

GMP+ Feed Safety Assurance is a complete module for the assurance of feed safety in all the links of the feed chain. Demonstrable assurance of feed safety is a 'license to sell' in many countries and markets and participation in the GMP+ FSA module can facilitate this excellently. Based on needs in practice, multiple components have been integrated into the GMP+ FSA module, such as requirements for the quality management system (ISO 9001), HACCP, product standards, traceability, monitoring, prerequisites programmes, chain approach and the Early Warning System.

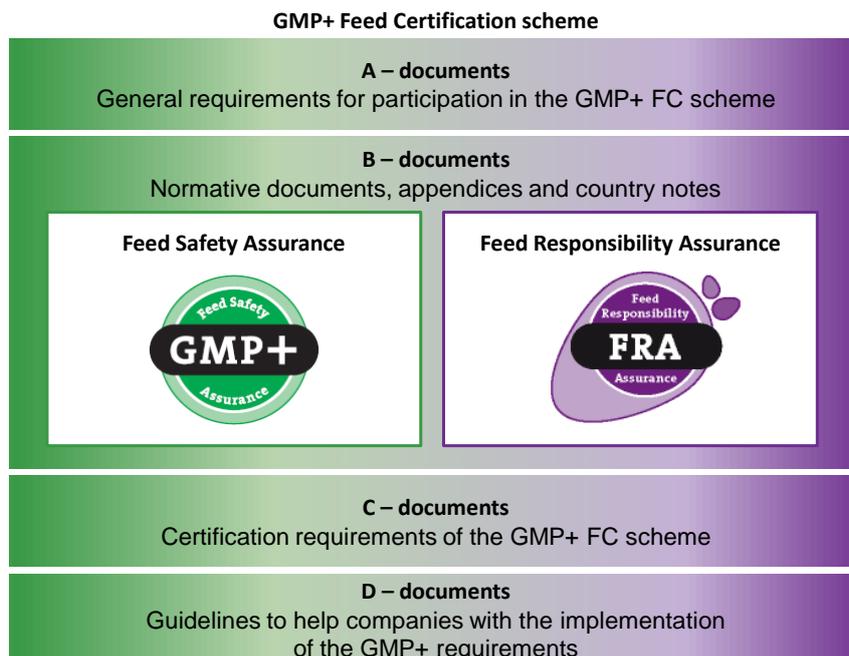
With the development of the GMP+ Feed Responsibility Assurance module, GMP+ International is responding to requests by GMP+ participants. The animal feed sector is confronted with requests on working responsibly. This includes, for example, the use of soy (including soy derivatives and soy products) and fishmeal which are produced and traded with respect for humans, animals and the environment. In order to demonstrate responsible production and trade, a company can get certified for the GMP+ Feed Responsibility Assurance.

Together with the GMP+ partners, GMP+ International transparently sets clear requirements to guarantee feed safety & responsibility. Certification bodies are able to carry out GMP+ certification independently.

GMP+ International supports the GMP+ participants with useful and practical information by way of a number of guidance documents, databases, newsletters, Q&A lists and seminars.

1.2 Structure of the GMP+ Feed Certification scheme

The documents within the GMP+ Feed Certification scheme are subdivided into a number of series. The next page shows a schematic representation of the content of the GMP+ Feed Certification scheme:



All these documents are available through the website of GMP+ International (www.gmpplus.org).

The document in the present case is referred to as GMP+ D1.1 *Procedure Benchmark GMP+*.

It is not a normative document, but gives guidance to comply with specific GMP+ requirements. The information of this document can be used as a guidance for the implementation of the GMP+ FSA norms.

2 Aim and scope of the document

One of the main basic principles in the GMP+ FC scheme is the so-called 'closed-chain approach'. This means in practice that a GMP+ certified company can only buy feed products (for instance feed materials or pre-mixtures) or services (for instance transport or storage) from a supplier, who can demonstrably guarantee the same feed safety or responsibility level as in GMP+ FC scheme is required. Preferably this supplier is GMP+ certified but also other certificates might give this guarantee.

Recognizing other certificates as equivalent to GMP+ FC scheme helps to create a level playing field where companies can participate in a certification scheme of their own choice, and will be able to buy feeds from or deliver to companies participating in another certification scheme and thus avoid double audits and double costs for certification of the same activity.

Another certification scheme needs to be assessed in a transparent and objective way in order to decide that the applicant's certification scheme guarantees the same level of feed safety or responsibility as the GMP+ FC scheme. This document describes the procedure for comparing a specific feed or food safety or responsibility assurance scheme to (parts of) the GMP+ FC scheme in order to decide on equivalency. The criteria and conditions for the comparison and also the method of working to be followed are laid down. The comparison is focused on the content of the certification scheme, including the certification is carried out.

GMP+ International will use the procedure described in this document to ensure an independent and transparent assessment of the certification scheme in question.

The results of the comparison will be used to decide, if a certification scheme offers assurance which is comparable to the GMP+ FC scheme. Based on the comparison, GMP+ International can decide to accept a particular certification scheme as equivalent to the GMP+ FC scheme.

In the event of equivalency, two possible options are applicable. The first one is **mutual recognition** (bilateral) and the second one is (unilateral) **acceptance**. In general, mutual recognition will be applied. When GMP+ International considers it desirable and suitable, acceptance is also possible.

3 Definitions

In addition to GMP+ A2 *Definitions and Abbreviations*

Applicant	The scheme owner of a specific food or feed safety or responsibility scheme, who - by means of this benchmark procedure - wants to seek equivalency with the GMP+ FC scheme in order to become accepted or to conclude on mutual recognition with GMP+ International.
Benchmark procedure	The procedure, laid down in this document, to compare a certain safety or responsibility scheme with GMP+ FC scheme.

4 Benchmark procedure

4.1 Introduction

This chapter contains the criteria and requirements and also the method of working to compare a particular certification scheme with the GMP+ FC scheme, in order to decide on equivalency. The comparison is focussed on the standards and on the rules for certification.

Standards

It is possible to compare one or more standards of the scheme of the applicant with one or more standards of the GMP+ FC scheme. A list of comparable standards/scopes will be drawn up to define the scope of the agreement. See paragraph 4.3.4.

For further information on these different standards/scopes of the GMP+ FC scheme, please refer to the website www.gmpplus.org.

Rules of certification

There must be an equivalent set of rules of certification in the certification scheme of the applicant, who seeks acceptance or mutual recognition. The rules of certification must include criteria for certification bodies and auditors and for auditing and certification. Also a kind of supervision structure must be operational in order to have a clear view on the correct performance of the applicant's scheme.

GMP+ International has presented the minimum requirements for all certification bodies which carry out audits under the GMP+ FC scheme in a number of C-documents. Also these documents can be found on the website www.gmpplus.org

GMP+ International maintains the GMP+ FC scheme on the basis of new developments and changing insights. If changes to the certification scheme make it necessary, GMP+ International will implement changes to the criteria or procedure for acceptance.

GMP+ International will ensure that the most recent version of this comparison document can be found at www.gmpplus.org. The applicant must ensure that at the moment of application of the most up-to-date version of the comparison document is used.

4.2 Minimum requirements for an equivalent certification scheme

The certification scheme must:

- a. Be drawn up and operated in an independent and transparent way by an organisation which is a legal entity. This organisation must also be the owner of the certification scheme and must also hold the copyright to the certification scheme. Other activities of this organisation must not create a conflict of interest with operating this certification scheme.
- b. Be demonstrably developed and administrated with the cooperation of technically competent representatives of the stakeholders involved (like a Committee of Experts) or be assessed by such stakeholders and found to be suitable.

- c. Be intended for assuring the safety or responsibility of animal feed or feed materials. HACCP principles must be applied when assessing the risks. In addition, the necessary system requirements must be present so that at least the relevant GMP+ FSA requirements are assured.
- d. Contain comparable product standards as specified in GMP+ BA1 *Product Standards* of the GMP+ FSA module;
- e. At least regularly but every three years at the latest, there must be an evaluation and update together with the parties involved.
- f. Be clear in the language and terminology used to draw them up so that a precise and uniform interpretation of the requirements can be achieved during the audit at the company.
- g. Have support and credibility in the sector, regulatory bodies and/or the relevant professional groups. There must be a substantial number of companies participating in the certification scheme.
- h. Be publicly available for implementation without the need for membership or other restrictions (of a non-commercial nature). The levying of a reasonable rate for the purchasing of the certification scheme or the certification rate for implementation will not be considered to be a restriction or limitation.
- i. Be certifiable. There must be an operational certification scheme. The applicant must record agreements with individual certification bodies which carry out audits of the certification scheme in question. It must be demonstrable that the certification body works in accordance with the requirements
- j. Not allow products which are not produced under the applicable certification scheme are labelled or described in a way which suggests that they comply with a particular product standard or specification.
- k. Comparable with respect to content and method of supervision with the GMP+ FC scheme.

4.3 Procedure

GMP+ International will use the following procedure to determine whether a certification scheme is demonstrably equivalent to the GMP+ FC scheme.

- a. Application by the applicant
- b. Independent technical assessment
- c. Advice of the International Expert Committee of GMP+ International
- d. Final decision and drawing up of an agreement.

4.3.1 Application by the applicant

The application is submitted in writing by the applicant to GMP+ International. The applicant must at the time of application provide GMP+ International with a dossier which contains at least the following information:

a	Fully completed application form (Appendix I)	
b	The original certification scheme + a possible translation into English	
c	Documents relating to the certification scheme + a possible translation into English	

d	A comparison of the content of both schemes	To be carried out by completing Appendices II and III
e	Comparison of the rules of certification of both schemes	Auditor qualifications, requirements with respect to training and experience, minimum requirements for audit reports, duration and frequency of audits, assessment criteria for certification. See Appendix IV.
f	Other relevant documents which may be important for showing that the requirements in this document have been met	

The necessary documents must be submitted in English. When an application is submitted for a certification scheme which was not originally drawn up in English, a translated version into English must also be submitted unless GMP+ International and the applicant agree otherwise. A declaration from a certified translator relating to the correctness of the translation must be enclosed. This also applies to the other documents in the dossier.

Next to these submitted documents, the applicant has to pay a fee to GMP+ International. The following table shows the costs associated with the benchmark procedure. The total costs of the benchmark procedure will be charged to the applicant.

Step	Description	Costs €	Remarks
1	Application	€ 3,000.-	The application costs include all charges for administration, mutual deliberation, the preparatory assessment and the assessment by the International Expert Committee (4.3.1; 4.3.2.1; 4.3.2.2; 4.3.4; 4.3.5).
2	Independent technical assessment	p.m.; to be paid by the applicant	4.3.2.3
3	Costs for attending at least two parallel audits	€ 2,500,- + travel & accommodation expenses	4.3.2.4

On receipt of the application documents and the application fee, GMP+ International will send a letter of confirmation to the applicant stating on which date the application was received and how the procedure will be followed.

4.3.2 Independent technical assessment

4.3.2.1 *Preparatory assessment*

GMP+ International will subject the application for the acceptance of a certification scheme to an initial (preparatory) assessment. GMP+ International will set up its own screening committee for this purpose. A quick scan will be made on whether the application meets the requirements set in 4.2 and 4.3.1.

4.3.2.2 *Determining follow-up procedure*

After approval of the application GMP+ International will inform the applicant in writing of the procedure from that point and of the costs involved. The applicant must agree to the further course of the procedure.

4.3.2.3 *Independent technical assessment*

If the applicant and GMP+ International agree to continue the procedure, a technical assessment of the equivalency of the certification schemes must be carried out by an independent organisation. An independent organisation is a knowledge organisation which is active in the testing and certifying of products and services and which provides an independent judgement (for example TNO or an equivalent independent institute).

The applicant must issue the order for this assessment itself to an independent organisation. GMP+ International has to agree in advance to the organisation which is selected.

If GMP+ International or the applicant consider an information meeting desirable, this will be organised.

The report of the independent assessment must contain the following sections:

- a. a summary of all the findings;
- b. a detailed report of the comparison of the certification scheme by the independent organization including an assessment regarding the level of equivalency.

4.3.2.4 *Audit attendance*

GMP+ International is entitled (if it considers it necessary) to attend one or more audits of the applicant scheme to assess the quality of the audit. This attendance will be done by an employee of GMP+ International (unless otherwise agreed). This employee will draw up a report with results of this assessment.

4.3.3 Advice of IEC

GMP+ International will assess the report by the independent organisation and, if applicable, the report on attendance at the audit(s) and submit them for advice to International Expert Committee.

The International Expert Committee will advise GMP+ International on whether the certification scheme is equivalent with the GMP+ FC scheme or not..

4.3.4 Final decision and agreement

GMP+ International will make a final decision and inform the applicant in writing. The following options are possible:

4.3.4.1 *Acceptance*

In the event of acceptance of the certification scheme, GMP+ International will enter into an agreement with the applicant. In Appendix I a model for an agreement is presented, which shows what necessary elements must be part of this agreement.

GMP+ International will include the necessary information in the relevant GMP+ documents, for instance in GMP+ BA10 *Minimum requirements for Purchasing*. GMP+ International and the applicant will decide how to publish this acceptance.

The agreement will have a maximum period of currency of 4 years. During this period the scheme owner has to pay € 3000,- annually to GMP+ International to cover the costs.

If the applicant consider it necessary to continue the acceptance or mutual recognition, he must require an evaluation of the equivalency approximately 1 year before the period for acceptance ends. This evaluation, including the costs, will be based on this benchmark procedure. See for details the steps in section 4.3.1.

4.3.4.2 Acceptance after changes or improvements

If the certification scheme is not accepted unless changes are made, the applicant must first demonstrate how the changes are implemented in the relevant documents of the applicant's scheme and by the participants of the applicant's scheme. GMP+ International will assess whether this is satisfactorily.

If so, the procedure starts from 4.3.3.

4.3.4.3 Rejection

If GMP+ International refuses to accept a certification scheme, the applicant must be informed in writing of the reasons for this refusal. This also applies if a positive recommendation from the independent technical report is not accepted. GMP+ International must indicate to the applicant in question on which grounds the advice of the independent assessment was not followed.

Appendix I: Application Form

Information with respect to the applicant:	
Contact person:	
Name of the organisation	
Address:	
Country:	
Telephone number:	
Fax:	
E-mail:	
Information about the certification scheme	
Application for acceptance with respect to which section/scope of the GMP+ FC scheme?	
Original language of the certification scheme	
Number of companies certified	
Date of first certificate	
Aim of the certification scheme	
History: a. How was the certification scheme established? How long has the certification scheme been in use? Which improvement measures have been added to the certification scheme over time? Which parties (in the chain) were involved in the development of the certification scheme? Other developments, etc.	
Other remarks	

Appendix II: General table of comparison¹

	The applicant's certification scheme must:	Explanation and comments to support equivalency of applicant's scheme
a	Be drawn up and operated in an independent and transparent way by an organisation which is a legal entity. This organisation must also be the owner of the certification scheme and must also hold the copyright to the certification scheme. Other activities of this organisation must not create a conflict of interest with operating this certification scheme.	
b	Be demonstrably developed and administered with the cooperation of technically competent representatives of the stakeholders involved (like a Committee of Experts) or be assessed by such stakeholders and found to be suitable.	
c	Be intended for assuring the safety or responsibility of animal feed or feed materials. HACCP principles must be applied when assessing the risks. In addition, the necessary system requirements must be present so that at least the relevant GMP+ FSA requirements are assured.	
d	Contain comparable product standards as specified in GMP+ BA1 <i>Product Standards</i> of the GMP+ FC scheme;	
e	At least regularly but every three years at the latest, there must be an evaluation and update together with the parties involved.	
f	Be clear in the language and terminology used to draw them up so that a precise and uniform interpretation of the requirements can be achieved during the audit at the company.	
g	Have support and credibility in the sector, regulatory bodies and/or the relevant professional groups. There must	

¹ Derived from chapter 4.2

	be a substantial number of companies participating in the certification scheme.	
h	Be publicly available for implementation without the need for membership or other restrictions (of a non-commercial nature). The levying of a reasonable rate for the purchasing of the certification scheme or the certification rate for implementation will not be considered to be a restriction or limitation.	
i	Be certifiable. There must be an operational certification scheme. The applicant must record agreements with individual certification bodies which carry out audits of the certification scheme in question. It must be demonstrable that the certification body works in accordance with the requirements	
j	Agree with respect to content and method of supervision with the GMP+ FC scheme.	
k	Comparable with respect to content and method of supervision with the GMP+ FC scheme.	

Appendix III: Cross reference table for the content of the GMP+ FC scheme

The documentation which is submitted to GMP+ International must include a cross-reference table. When drawing up the cross-reference table use must be made of the checklists used during the GMP+ audits. These checklists can be found on the website of GMP+ International

Appendix IV: CERTIFICATION CROSS-REFERENCE TABLE

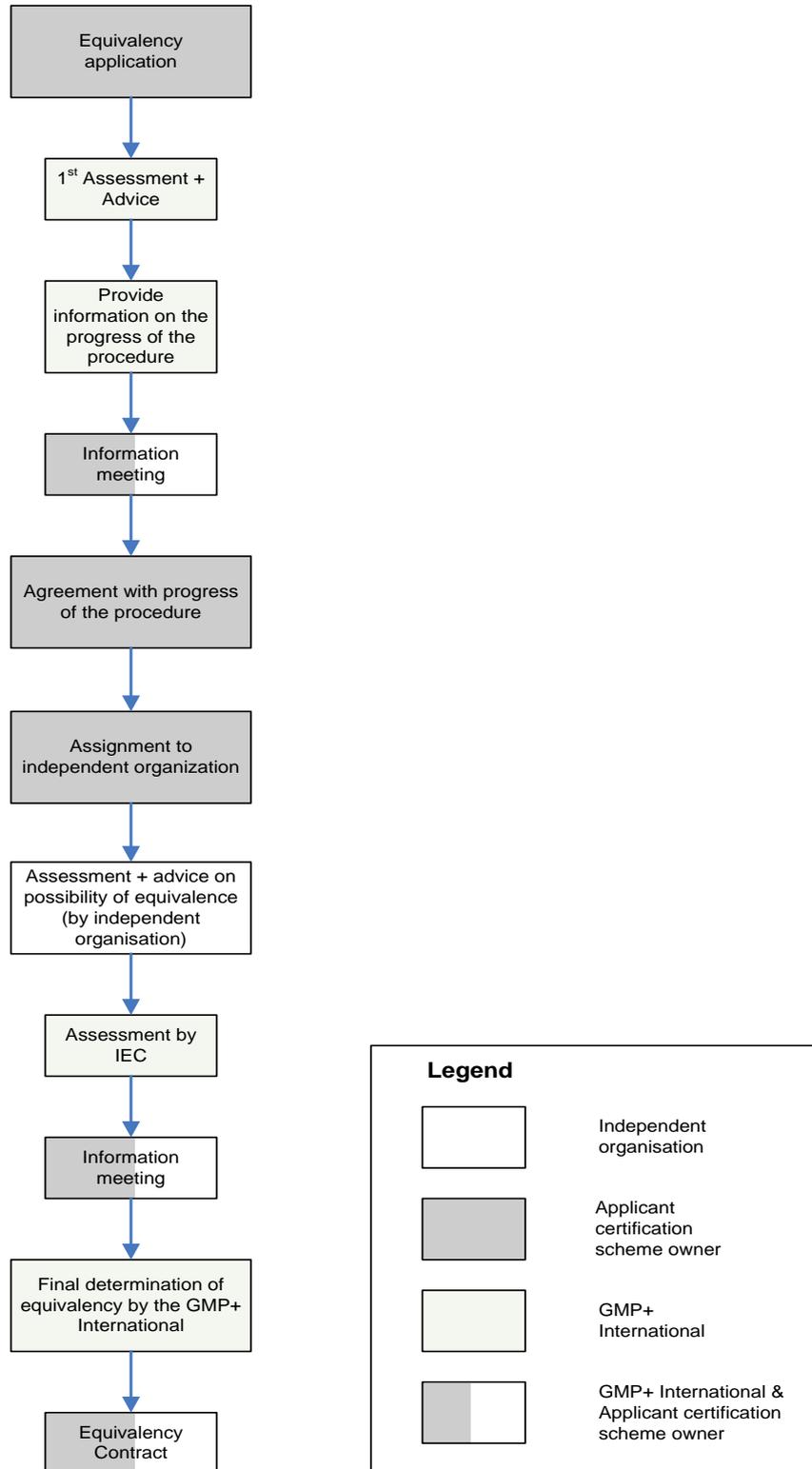
The certification structure must include at least the following components.

GMP+ C1 <i>Approval Requirements and Procedure for Certification Bodies</i>	Equivalent standard: <i>Name; version</i>
4.3 Requirements for certification bodies	
<p>A certification body must be accredited (if applicable) for the GMP+ standards for which they have applied for approval pursuant to this document, in accordance with the requirements in appendix 1, by an accreditation body which is a member of the IAF Multi-Lateral Agreement (MLA), not later than one year after the date of approval by GMP+ International.</p> <p>Certification body enters into a contract with GMP+ International as specified in GMP+ A1. The contract may be cancelled in the event of non-compliance with the requirements.</p>	
4.4 Independence, impartiality, consultancy	
<p>Requirements for independence / impartiality as described in EN 45011 and/or ISO 17020.</p> <p>The certification body and the auditor may, within a period of two years prior to the audit, not have undertaken any consultancy or training activities for the company to be audited. The quality system and the accounting records of the certification body must show this.</p>	
4.5 Requirements for auditors (material expertise and skills)	
<p>The auditors to be used must demonstrably comply with the requirements of the qualification standards specified in Appendix 2 (training, required knowledge, audit skills, working experience).</p>	
4.5 / Appendix 2 Requirements for auditors (initial training and examinations)	
<p>Auditors must have demonstrably followed the established initial training programme organised by the certification body. The content of the training programme must be demonstrable.</p> <p>After the training programme the auditor must successfully take an initial examination for each GMP+ standard. This examination will be held by GMP+ International on behalf of the IEC.</p> <p>Approved auditors are included in a database</p>	

4.5 / Appendix 2 Requirements for auditors (updating of professional expertise)		
	Each auditor or coordinator will attend at least the mandatory number of hours per year at the professional meetings organised by the certification body: In order to retain approval each auditor or coordinator must carry out at least five audits per year per standard / scope for which the auditor or coordinator in question has been approved. A policy coordination and harmonisation meeting with the coordinators will be organised 3 times per year.	
GMP+ C2 3.2 / GMP+ C3 3.10 Supervision of certification bodies		
	a. via a certified accreditation body. certification body audit witness audit parallel audit random sample check of reporting periodic examination organised by GMP+ International (on behalf of the IEC). category 1 shortcomings must be reported to GMP+ International.	
GMP+ A4 Disputes		
	<i>The GMP+ Disputes Committee is tasked with adjudicating in all disputes which may arise between participants and certification bodies as well between participants on the one hand and GMP+ International and the ICE on the other hand.</i>	
GMP+ C3 / C6		
Appendix 2 Frequency and duration of audit		
	Frequency and minimum time expenditure prescribed by GMP+ International for audits; depends on the activities and the size of company.	
3.8 / Depth of the audit		
	The certification body is obliged to make use of the <i>checklist(s)</i> (GMP+ C5) adopted by GMP+ International during every audit visit. The certification body will report on the GMP+ audit in accordance with the sample report in Appendix 3.	
Appendix 1 / GMP C3/C6 Assessment / audit findings		
	The conditions must be completely met. A system is used of categories of non-conformities (cat.1, cat. 2, Cat. 3). Non-conformities which are not resolved or not in time will be recorded again (re-classified).	

Appendix 1 Sanctions		
	<p>Proper improvement measures within the period of time established by the auditor.</p> <p>Possible recall of products.</p> <p>Intensification of checking</p> <p>Suspension of certificate.</p> <p>Withdrawal of a certificate</p>	
3.9 Period of validity of a certificate		
	<p>Certificates will be issued to each company location for a period of three years with the exception of GMP+ B4.3 .</p>	

Appendix V: Flow chart comparison procedure



Appendix VI: template for an agreement

Agreement of mutual recognition

The following parties, XXXX, registered at under number, owner of YYYY, represented by (name and function), referred to hereafter as 'XXXX' or 'party'

and

GMP+ International B.V., Stadhoudersplantsoen 12, 2517 JL Den Haag, registered at the Chamber of Commerce under number 27364542, owner of GMP+ Feed Certification scheme (GMP+ FC scheme), represented by Johan den Hartog, Managing Director, referred to hereafter as 'GMP+' or 'party'

Considering that:

- GMP+ manages a feed certification scheme, called the GMP+ Feed Certification (GMP+ FC) scheme;
- XXXX manages a feed certification scheme, called YYYY;
- Based on a comparison the certification schemes are equivalent and provide the same level of feed safety or responsibility control;
- Companies certified according to one of the certification schemes mentioned before, trade with each other frequently;
- It is in the interest of the GMP+ certified companies and the GMP+ certified companies to harmonize both certification schemes and that they are able to sell and buy the feed products of each others;

Agree the following

The standards of the GMP+ FC scheme of GMP+ and the standards of YYYY of XXXX, as listed in Annex 1, are exchangeable under the following conditions:

1. Both parties are committed to providing each other with information relating to any intended changes to the certification schemes prior to their introduction.
2. All activities relating to the respective certification schemes will be certified by EN 45011, ISO/IEC 17021 or ISO/IEC 17020 accredited certification bodies / inspection bodies, which have been accepted by one of the parties and shall be considered as fully interchangeable.
3. Based on this principle, the companies certified for one of the certification schemes are entitled to supply products to companies certified for the other certification scheme. These stipulation is subject to the supplementary condition that
4. If necessary, XXXX is entitled to conduct an audit on a GMP+ certified company in cooperation with a GMP+ auditor. Conversely, GMP+ is entitled to conduct an audit on a XXXX certified company in cooperation with a XXXX auditor.

5. If a certificate of a company is suspended within one of the certification schemes, the other party shall not accept this company's participation to its certification scheme during the suspension period.
6. If a company's certificate has been revoked, the other party shall abide by the former party's exclusion period and shall not accept participation in its certification scheme by that company or the legal entity that owns the entity whose certificate was revoked.
7. If one of the parties to a different certification scheme receives an interchangeability request, the relevant party shall inform the other party accordingly in compliance with this contract. If this party indicates its willingness to complete the interchangeability process jointly, both parties will commit to act on their intention.
8. In order to ensure continued interchangeability of both certification schemes, parties shall assess interchangeability on a biennial basis, unless one of the parties feels that an intermediate assessment is required. The results of such assessments shall be recorded in writing. If necessary, the above-mentioned table will be updated every two years and after any intermediate assessments.

This agreement has a period of currency of 4 years. In order to ensure continued acceptance of the YYYY an evaluation must be carried out during the last year of the current agreement. XXXX must apply for such an evaluation, which will be based on the benchmark procedure of GMP+ International. Both XXXX and GMP+ International can consider an earlier evaluation necessary.

GMP+ International requires that XXXX:

1. Makes no use of the acceptance in any way which might bring the GMP+ FC scheme into discredit. XXXX should not make any statement with respect to the acceptance which is or could be misleading or unauthorised. In the event of misuse of the acceptance the GMP+ International retains the right to claim the damage created from the party responsible.
2. In the event of suspension or withdrawal of the acceptance, use will no longer be made in any way whatsoever of advertising which makes any reference to the GMP+ FC scheme.
All documents relating to the acceptance must in the event of suspension or withdrawal be returned to the GMP+ International.

Rijswijk, DATE

PLACE, DATE

For GMP+ International

For XXXX

Johan den Hartog
Managing Director

.....
.....

Annexes

- Table with equivalent standards and scopes
-
-

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