



NON-GMO  
STANDARD

# **FoodChain ID Non-GMO Global Standard**

Version 7.0– December 1, 2019



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## SECTION I – INTRODUCTION

FoodChain ID is globally recognized as the leader in analytical detection, risk assessment, and control of genetically modified organisms (GMOs) and their products across the entire production chain, from primary genome (seed, microbe, breed) through end-consumer product. With over two decades of experience and having been the original developer of GMO detection technology, FoodChain ID is committed to staying at the forefront of technological and practical developments in order to serve a full spectrum of stakeholders with a variety of interests and needs. Authenticity of claims about the quality and identity of genetic resources and products, transparency through the supply chain, and guidance on consistently reliable practices to assure these are at the heart of FoodChain ID's service offerings.

Genetic engineering and modern biotechnology continue to be among the most complex and powerful phenomena humans have ever developed. Technological, technical, economic, and political considerations pervade all producers' and consumers' actions and choices. Since the mid-1990s GMOs have become increasingly present in many supply chains worldwide; excluding them by choice or by legal requirement has correspondingly become more challenging to achieve. In some cases, absolute exclusion is simply not feasible; in certain scenarios or sectors of production, material detection becomes elusive or not yet possible – in short, compromises and good judgement are needed in order to make a reasonable, feasible, transparent, and truthful claim. FoodChain ID, with its long experience in this realm, recognizes its responsibility to help lead the way forward on this subject of increasing concern to citizens worldwide.

FoodChain ID is committed to ongoing improvement of practices by all concerned and invites collaboration. This Standard is a key vehicle for implementing best practices and undergoes regular stakeholder consultation as part of the revision process. It serves as a way for producers to assure the quality of their own operations and products and make credible claims to consumers. While standards such as this are primarily used by actors across the value chain, FoodChain ID recognizes that other stakeholders with aligned interest can also be a support to help users of this Standard improve practices, as well as to help the standard evolve over time to be even more useful, whether this support comes from technological, regulatory, communications, or other sources. All such interests are invited and welcome to engage; communication links can be found at <http://www.foodchainid.com> or be directed to [info@foodchainid.com](mailto:info@foodchainid.com)

### The FoodChain ID Non-GMO Global Standard

FoodChain ID Certification<sup>1</sup> launched its first non-GMO Certification Program and Non-GMO Trademark (product seal) in 1999 to easily identify non-GMO products in the marketplace. This standard was previously known as the "Cert ID Non-GMO Certification." Since the beginning, the FoodChain ID Non-GMO Global Standard has been recognized within the industry as the

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<sup>1</sup> formerly known as Cert-ID

benchmark for a non-GMO production system. This new version of the Standard has been expanded to keep pace with the growing complexity and needs of the market.

## **SECTION II - SCOPE**

All enterprises regardless of size are welcome to use this Standard. Organizations seeking certification under this Standard must demonstrate conformance through annual audits, risk assessments and traceability supported by sampling and testing methodologies, which validate that the target market thresholds and labeling requirements are being met.

This Standard may be used in business-to-business (B2B) or business-to-consumer (B2C) applications. It is applicable to organizations involved in the cultivation, production, processing, storage, distribution, logistics, and/or trade of non-GM organisms and products. Product certification may be requested for specific genomes (seed, breeds, microbial preparations including prebiotics and probiotics, aquaculture products, etc.); raw crop materials (including fungi), derivatives, additives, and processing aids derived therefrom; animal feed, livestock, and livestock products; and final consumer goods (single or multi-ingredient).

Non-GMO markets worldwide have diverse regulatory systems making it increasingly complex for organizations to confidently approach and access varied global markets. The FoodChain ID Non-GMO Global Standard recognizes the importance of offering market-oriented solutions and adapting certification to meet these different markets. This version accommodates the need to provide certification that is flexible and able to satisfy the requirements of the target markets. Certification is designed to be region specific, so organizations can satisfy the requirements of non-GMO markets of their choice and multiple non-GMO markets.

Mandatory government regulations regarding labeling of GMOs require “positive” claims, i.e. that operators must disclose when a given product does contain GM components. Examples are EU regulations on labeling of GMOs, the USDA National Bioengineered Foods Disclosure Standard, Brazilian regulations, and others. In contrast, the FoodChain ID Non-GMO Standard provides for “negative” claims, i.e. that a given product does not contain GMOs or ingredients derived from GMOs. Nonetheless, compliance with this Standard also serves as an assurance to operations that the products they place on the market comply with relevant government regulations; requirements in this Standard have been deliberately written so that a compliant Non-GMO claim for the market in question assures that no positive claim of GMO inclusion is necessary.

**Note:** The recent advent of new genetic modification techniques such as Cis-genesis, RNA interference, CRISPR/Cas, TALEN, Zinc finger nucleases and other “gene editing” techniques pose new challenges for detection and control of flow of new genomes created through these methods. This version of the FoodChain ID Non-GMO Global Standard (as begun with the previous version 6.2) addresses these challenges through the most realistic practices and techniques currently available. It is expected that additional assurance methods will become available in the future, and this Standard will be updated

accordingly. The rationale behind this approach is to maintain consistency of expectations among the most prevalent non-GMO markets and thereby avoid confusion among stakeholders<sup>2</sup>.

## Site Inspections

Desk-based reviews are conducted by FoodChain ID as part of the certification process for all operations. Additionally, site inspections are required in the following cases, although FoodChain ID reserves the right to conduct additional announced and unannounced site inspections at its discretion:

- Farms seeking certification in their own right and are producing seed or crops that are listed on Annexes A or B of this Standard.
- Livestock operations seeking certification in their own right and are feeding at-risk feed materials to their livestock.
- Processing and other operations handling at-risk inputs that are not verified as non-GMO in accordance with this standard prior to the inputs being received at the facility, or where at-risk ingredients are handled in parallel both as verified non-GMO and not verified as being non-GMO. Operations handling relevant inputs in impermeable packaging, where the package or label is not changed may be exempt from site inspection, based on risk assessed by FoodChain ID.

## SECTION III - CERTIFICATION REQUIREMENTS

### Methodology

Products certified under this Standard are verified to have been formulated to minimize risk of inclusion of genetically engineered organisms during the production or manufacturing process across the entire chain, and that any inadvertent or unavoidable presence is strictly controlled with very low tolerance levels. This is achieved through a combination of risk assessment and corresponding quality management systems that include analytical testing at key points across the production chain and strict control of processes to assure identity preservation of all allowed production inputs.

**Guidance Notes:** Following a clause, a Guidance Note may be provided to help interpret the Standard and explain the intent of the given clause, offer additional relevant details, and/or provide an example to better understand the clause. Heeding guidance is not absolutely mandatory to achieve compliance with the Standard but is strongly recommended.

<sup>2</sup> The European Union considers such novel techniques as falling under EU regulations for labeling of GMOs, per a decision issued by the European Court of Justice on 25 July 2018 (see <https://curia.europa.eu/jcms/upload/docs/application/pdf/2018-07/cp180111en.pdf>). In North America, the Non-GMO Project Standard considers such novel techniques as being GMOs – see <https://www.nongmoproject.org/wp-content/uploads/Non-GMO-Project-Standard-Version-15.pdf>.)



## 1.0 FoodChain ID product labeling and labeling categories

- 1.1** FoodChain ID Non-GMO certification claims may be used on retail or non-retail packaging and on related marketing materials. All labels and other market claims must be approved in writing in advance by FoodChain ID.
- 1.1.1** Use of the FoodChain ID Non-GMO seals is voluntary. All seal use must be approved in writing by FoodChain ID in advance of use.
  - 1.1.2** Where the organization elects to use the FoodChain ID Non-GMO logo or another Non-GMO related claim, the product bearing the claim shall respect the targeted tolerance levels both in the countries where the products are produced and where final products are intended for sale.
- 1.2** FoodChain ID Non-GMO certification claims may not be made on any products that are prohibited by law to carry non-GMO claims in the relevant market(s).
- 1.2.1** Certified operators shall be responsible for obeying legal restrictions on labeling imposed in specific target markets for certain product categories, eg alcoholic beverages, meat products, etc.<sup>3</sup>
- 1.3** The Organization shall claim FoodChain ID certification only for products made at the facilities or sites approved under the FoodChain ID Standard.
- 1.4** In no case may a product carry a FoodChain ID Non-GMO claim if it is required by law (or any other voluntary program in which the operation participates) to make a disclosure indicating the presence of genetically engineered (or bioengineered, or similarly defined term) material.
- 1.5** This Standard provides for a variety of Non-GMO certification and labeling categories, depending on formulation and subject to mandatory government regulations and targeted tolerance thresholds in force in the market(s) in which products are placed. Labeling categories include the following:
- 1.5.1** “Non-GMO” – Products in this category have been verified to not contain any GMO components, in line with this Standard.
    - 1.5.1.1** Non-GMO claims may not include statements about the absolute absence of GM material such as “zero GMOs” or “GMO free.”
  - 1.5.2** “No GMO Risk” – Products in this category must be confirmed to not be formulated with any input that has a GMO analog or any component that may pose a potential GMO risk, as indicated in section 2 and Annexes A and B of this Standard. For qualifying product formulations, this labeling

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<sup>3</sup> For example, claims on meat, poultry, and egg products in the US is subject to restrictions imposed by FSIS; operators must consult with AMS (the United States Agricultural Marketing Service) as well as FoodChain ID prior to making such claims.



option may be used as an alternative to the “Non-GMO” option indicated in clause 1.5.1.

**1.5.3** “Made with Non-GMO <ingredient(s)>” – For at least 70% of the product’s formulation, specified at-risk GMO ingredients have been verified to not be GMO through analysis and/or process controls as required by this Standard.

**1.5.3.1** Such labels may only refer on the principal display panel of the label to a maximum of 3 ingredients, or a maximum of 3 food groups where all components of said food groups are non-GMO. The font size of the “made with” statement must not exceed one-half of the largest font size of the principal display panel and must not have special highlighting.

**1.5.3.2** The ingredient declaration on the label must indicate each ingredient that is certified non-GMO under the FoodChain ID Non-GMO Global Standard with either the modifying descriptor “non-GMO” or an asterisk or similar indicator, which below the ingredient statement explains that the indicator signifies the non-GMO status. Water and non-biological ingredients may not be described as non-GMO and do not count in the percentage calculation.

**1.5.4** “X% Verified Non-GMO” – where the verified percentage of non-GMO ingredients is calculated based on the total formulation not including added water and any ingredients not from a biological source (e.g. salt), rounded down to the nearest whole number. The font size of the percentage declaration must not exceed one-half of the largest font size of the principal display panel and must not have special highlighting.

**1.5.4.1** The ingredient declaration on the label must indicate each ingredient that is certified non-GMO under the FoodChain ID Non-GMO Global Standard with either the modifying descriptor “non-GMO” or an asterisk or similar indicator, which below the ingredient statement explains that the indicator signifies the non-GMO status. Water and non-biological ingredients may not be described as non-GMO and do not count in the percentage calculation.

**1.6** Where the Organization deals with both certified and uncertified products, it must ensure that the FoodChain ID Non-GMO logo is only used in respect to FoodChain ID certified products and that certified products are clearly distinguished from uncertified products.





## 2.0 Inputs & Sourcing

### 2.1 Sourcing of inputs

**2.1.1** Operations shall conduct a risk assessment of all inputs it uses in each facility covered by FoodChain ID Non-GMO certification. A written risk assessment plan shall be reviewed at least once every 12 months and updated any time a change takes place that may affect the Non-GMO status of the products under certification.

This may include but not be limited to a change of:

- Targeted Threshold Tolerance Level(s),
- List(s) of relevant legally approved and non-approved GMOs in their target markets,
- Supplier(s) of inputs, (including country or region of origin),
- Ingredient(s) or ingredient source(s), including ones supplied by subcontractors
- Processing conditions or equipment,
- Storage or distribution conditions,
- Change(s) in job responsibilities,

**2.1.2** The Organization shall determine its Targeted Threshold Tolerance Level(s) for their targeted markets, in line with this Standard.

**2.1.3** Operations shall have written specifications for input sources and supplier approval including spot purchases to assure that inputs used in certified products are in accordance with the Targeted Threshold Tolerance Level(s) and other non-GMO verification requirements in this Standard.

**2.1.3.1** Input specifications shall be reviewed annually at a minimum, or any time a change to the input occurs.

**2.1.3.2** Input specifications shall be reviewed and updated as necessary when a new supplier is sought or if changes have been made to the specification.

**2.1.4** Specification sheets from all suppliers shall include, for each and every input supplied:

**2.1.4.1** Full disclosure of all components comprising the input

**2.1.4.2** The country of origin

**2.1.4.3** A statement from the supplier that declares inputs are non-GMO per the Standard's definition.



*Guidance:* FoodChain ID provides a standardized document for such declarations, which operators have the option to use instead of one they or their suppliers create.

**2.1.4.4** Test results that confirm at-risk inputs meet the Targeted Threshold Tolerance Level(s) for the presence of GMO for each lot of purchased at-risk inputs.

**2.1.4.5** Inputs that may be from at-risk species but have no testable protein or DNA shall have full non-GMO traceability back to the source where testable protein or DNA is present and has been tested to demonstrate that tolerances have been met.

**2.1.5** At-risk inputs shall be cross-checked with specification sheets to verify conformance with targeted tolerance levels has been met.

**2.1.6** Certified operations must document their review of inputs received from contracted suppliers who are not in themselves certified in accordance with the FoodChain ID Non-GMO Global Standard, in order to verify the conformity of those inputs with this Standard.

**2.1.6.1** The review should include a complete review of the supplying facility's standard operating procedures and relevant certifications in place, and any additional measures imposed to ensure there is no risk of nonconformity. The supplying facility shall be able to address control points as part of a risk assessment plan especially with regard to sections 2 through 6 of this Standard.

*Guidance:* FoodChain ID provides a Risk Assessment Plan Guideline that organizations can use to create a risk assessment plan.

*Note:* FoodChain ID may require an onsite audit of contracted suppliers based on risk, as determined on a case-by-case basis.

## 2.2 Prohibited inputs

**2.2.1** Operators may not deliberately use any input known to be from an intentionally GM source in certified products.

**2.2.2** The following may not be included in production or manufacture of certified products. Operators must demonstrate compliance with all such related inputs involved with their certified operations:

**2.2.2.1** GMO microbial cultures and/or functional enzymes therefrom



**2.2.2.2** Cloned animals or other GM livestock breeds

**2.2.2.3** Dairy inputs produced with the use of rBGH/rBST

**2.3 Risk inputs**

**2.3.1** At-risk inputs are indicated in Annex A of this Standard, and include species known to be commercially available in GMO form, and extends to derivatives of these species. The operation must identify which inputs that it uses are at risk per this Annex and is required to have documentation to validate that all inputs used in certified products meet the designated GMO targeted tolerance threshold for the target market.

**2.3.2** Targeted Tolerance Threshold Levels – Because inadvertent or unavoidable contamination of intended non-GMO input sources by GM material may occur beyond operators’ control, products certified under the FoodChain Non-GMO Global Standard that involve at-risk inputs must be verified to be below the following targeted tolerance thresholds:

Product category	Targeted Tolerance Threshold		
	European market <sup>a</sup>	North American market <sup>a</sup>	Other markets <sup>b</sup>
Seed <sup>c</sup>	0.1%	0.1%	0.1% or higher if specified by target market laws
Raw crops & processed products	0.9%	0.9%	0.9% or higher if specified by target market laws
Livestock feed <sup>d</sup>	0.9%	5%	0.9% or higher if specified by target market laws

<sup>a</sup>Only adventitious or unavoidable presence is tolerated. Deliberate inclusion is prohibited.

<sup>b</sup>The Targeted Tolerance Threshold for other markets is as stated unless a specific country’s regulation requires a lower threshold, in which case the lower threshold applies. Operators must be knowledgeable of the applicable requirements of the market in question.

<sup>c</sup>A post-harvest test is not required if FoodChain ID determines that there is no risk of cross pollination.

<sup>d</sup>The threshold is on a per-at-risk component. Animal-derived products (meat, milk, eggs, hides) are not testable in and of themselves but are considered at-risk if the animals are fed at-risk feed inputs. The targeted tolerance threshold applies to the applicable raw crop components of the feed on an as-fed basis.

**2.3.2.1** There is zero tolerance for presence of GMO material for varieties which are not legally allowed by the relevant market.



**2.3.3** Inputs that are a GMO risk but for which there are currently no analytic detection methods available shall undergo a risk assessment to determine what other methods are best suited to assure that certified products are non-GMO, including but not limited to the following:

**2.3.3.1** Documentation attesting to the non-GMO nature of the sourced ingredients (as defined by this Standard) for which there are currently no available analytic detection methods available (e.g. products of gene editing), of all lots used for certified products.

**2.3.3.2** Isotope testing may be considered as an option to validate country or region of origin.

## **2.4** Potential risk inputs

**2.4.1** Annex B of this Standard lists inputs that may be subject to GMO contamination either due to cross pollination in the field from compatible GMO species or to unauthorized escape of non-commercialized GMO varieties, or have been legally approved but are not commercialized. The operation must identify those inputs that it uses from this Annex and participate in a surveillance program in collaboration with the FoodChain ID Non-GMO Global Standard to assure that inadvertent GMO contamination of certified products is avoided.

**2.4.2** There is zero tolerance for GMO presence for input materials listed in Annex B.

**2.5** Downgrading of risk – At-risk inputs may be deemed to not be at risk under the following circumstances:

**2.5.1** The country of origin's regulations prohibit production of GMO varieties of the species in question. As such, there is no incidence of GMO use, and appropriate measures (eg identity preservation and traceability throughout the entire chain of custody) are in force to assure exclusion.

**2.5.2** The input is biologically transformed by non-GM methods/organisms and the resulting product absent of detectable GM material or purified to a degree that does not allow detectability of any GM material

**2.5.2.1** Any such inputs may be used in the further manufacturing of product formulations that bear a FoodChain ID Non-GMO seal or claim, but such inputs themselves may only bear a FoodChain ID Non-GMO market claim as a business-to-business ingredient that gets used in further product manufacturing, *unless* all substrates used in the fermentative/biological process are also verified to be non-GMO in accordance with this Standard.



**2.5.3** It is fully composted, or is animal manure that is applied as a farming input

**2.5.4** It is certified organic under the applicable market standard/regulation and used as livestock feed.

**2.5.4.1** In such cases, certified operations must participate in a surveillance testing program coordinated by FoodChain ID in order to monitor that at-risk feed components stay below targeted tolerance thresholds. Analytical results showing organic feedstuff in excess of the threshold will be subject to root cause analysis and appropriate remedial actions.

**2.6** Processing aids whose active components are in conformance with this Standard but also have GM (or potentially GM) components that do not have a technical effect and are not listed on the final product label may be used in certified product formulations.

### 3.0 Sampling & Testing

**3.1** All certified operations shall have a written risk-based sampling and testing plan that describes all relevant sampling and testing methods and procedures needed to conform to this Standard. All operational activities conducted pursuant to the plan shall be documented.

**3.1.1** Certified organic ingredients that are <5% of a formulation may be exempt from the sampling requirement, based on risk assessment.

**3.2** Sampling of ingredients - A sole at-risk ingredient in a single ingredient product and at-risk ingredients in a multi-ingredient product shall have been subject to sampling and GMO testing with the following specifications at appropriate place(s) in the supply chain: The sampling plan must be relevant to the source material, nature of the ingredient, and the processes through which it is handled.

**3.2.2** The sampling plan must at minimum describe the sampling procedure including the number of incremental (primary) samples, size of bulk (composite) and laboratory (test) sample, frequency and time interval of sampling, sample identification, relevant tests to be made on the sample, and sample retention.

**3.2.3** The sampling plan must be in accordance with relevant sampling rules that may include but are not limited to GAFTA, FOSFA, GIPSA, Regulation (EC) No. 619/2011, ISO 13690:1999. Operations must specify what norms they use in determining their sampling plan(s).



- 3.2.4** Sampling plans must be statistically significant and able to yield results with a minimum of 90% confidence. FoodChain ID will review sampling plans on a case-by-case basis.
- 3.2.5** Archive samples or retainers shall be held for the time frame during which the product would reasonably be expected to remain in the supply chain or based on risk assessment.
- 3.2.6** Individual sub-samples which make up a composite sample should be retained to permit individual sample testing in the event of a non-conforming composite result.
- 3.2.7** The sampling method must not itself cross-contaminate either the input/product or sample.

**3.3 Testing** - Test results shall confirm that the relevant targeted tolerance thresholds for the presence of GM have been met. PCR testing may be quantitative or qualitative, but in all cases must conclusively attest to targeted tolerance threshold requirements being met. FoodChain ID will review and approve all testing plans prior to awarding certification.

**3.3.1** Testing must cover all known GM events for the species in question.

**3.3.2** PCR testing - All FoodChain ID certified products must demonstrate non-GMO status through PCR testing of product at a point where sufficient DNA is present to validate the applicable targeted tolerance thresholds of the FoodChain ID Non-GMO Global Standard,

**3.3.2.1** The testing plan shall include consideration of possible risks of contamination by commercialized varieties that are unable to be tested due to unavailability of the genomic map and/or the absence of testing reagents (e.g. new transgenic or gene-edited varieties).<sup>4</sup>

**3.3.3** PCR testing methods shall include the screening of specific GM traits, non-approved varieties and appropriate GM tolerance levels as identified in the Testing Plan.

**3.3.4** All lots of at-risk inputs must be tested and confirmed below the applicable targeted tolerance threshold. Testing may occur anywhere along the chain of custody as long as identity preservation of the given lot is maintained and the targeted tolerance threshold is not exceeded thereafter.

**3.3.5** PCR testing must be done through a FoodChain ID approved laboratory.

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<sup>4</sup> As detection techniques become available, these will be reviewed and approved for validation by FoodChain ID.



**3.3.5.1** For consistency, uniformity and to reduce variation and error in the FoodChain ID Non-GMO Global Standard certification program, it is essential that GMO testing procedures and the analysis of test results be conducted in a uniform, consistent, and scientifically robust manner. The testing methods selected for this purpose are those that have been internationally established by the Global Laboratory Alliance (GLA). Laboratories that are not GLA members may either join, or license relevant methods from the GLA to satisfy the requirement of conducting PCR testing according to FoodChain ID approved methods.

**3.3.5.2** Laboratories must maintain ISO/IEC 17025:2005 accreditation for all relevant GMO events for the at-risk inputs involved and provide test result documentation that indicate the validity of the methods used.

**3.3.6** Organizations shall retain all applicable test results to validate that targeted tolerance thresholds have not been exceeded.

**3.3.6.1** The certified operation must report to FoodChain ID all test results above the targeted tolerance threshold, stating the input, source, and level detected.

**3.3.6.2** Lots that test above targeted tolerance threshold must be rejected and thus not used in the certified product.

**3.3.6.3** The operation must investigate the source of contamination if it is from a specific supplier, document root cause analysis for the lot being out of conformity, and the corresponding course of action to avoid such occurrence in future.

**3.3.6.4** A quality control report must be available to the to FoodChain ID and its auditors.

**3.4** Immunologically screening (strip tests) – Strip tests may be used for unprocessed raw material (inputs) as appropriate and based on risk assessment as an adjunct approach when rapid testing for the presence of GM contamination is essential.

**3.4.1** All personnel who conduct strip testing must demonstrate proficiency in the relevant procedure. Training of employees must be documented.

*Guidance:* When Immunologically screening is used, the spent test strip should be photographed or digitally scanned for record keeping. If test strips are retained for records, appropriate measures must be made to stop the immunological reaction by removing the respective parts of the strip, otherwise the result may change over time.



- 3.5** Testing of Purchased Livestock Feed - Purchased feed must show GMO content below the targeted tolerance threshold stated in section 2.4.2. Feed mills may use strip tests for incoming loads of raw crop but must use PCR analysis for finished lots of feed, with the targeted tolerance threshold heeded for each raw at-risk crop component.
- 3.6** Sampling and testing plans must be verified and validated at a minimum annually.

## 4.0 Control of Production and Processes

- 4.1** All established Non-GMO lots of inputs and ingredients should have designated identification markers to identify them as Non-GMO. Lot numbers, other ways of lot coding viz., color coding, name coding etc. can be used to identify Non-GMO lots.
- 4.2** All certified operations must assure complete segregation and identity preservation of non-GMO lots during all stages of operations, including production, handling, storage, processing, packaging and labeling to ensure that contamination or cross-contamination shall not occur. Certified operations must identify and document all critical control points where non-GMO integrity could be compromised and have measures in place to avoid commingling of the compliant and non-compliant lots of ingredients or products. This includes but may not be limited to the following:
- 4.2.1** Identified control points shall be documented and validated as applicable by scientific means through appropriate sampling and testing methods.
  - 4.2.2** Consistent coding and easy identification of the non-GMO lots at all critical control points
- 4.3** Equipment used in production and processing –
- 4.3.1** Product changeover from GMO containing inputs/products to non-GMO production shall be evaluated for possible GMO contamination risks. Appropriate control measures shall be implemented for each identified risk
  - 4.3.2** Equipment cleanout and/or flushing procedures used to segregate and protect non-GMO inputs/products shall be implemented and documented, with the procedures duly validated per clause 4.2.1
- 4.4** Storage areas and units – All storage facilities, areas, and related equipment must be clearly segregated from GMO risk. Non-GMO storage must be clearly demarcated as such.





- 4.4.1** The Organization shall maintain an inventory system that effectively accounts for all inputs and finished products that are non-GMO.

*Guidance:* If any area of the facility viz., storage, processing or production is shared, the compliant or approved inputs/ingredients should be stored above the non-compliant inputs/ingredients, processed before the non-compliant inputs are processed and production of certified products should occur prior to production of non-compliant products.

- 4.5** Packaging and other product-holding vessels must be verified and documented clean of potential GMO materials before being used for non-GMO inputs/products. All such contained lots must be duly identified physically as appropriate to the stage of production and on related documentation.
- 4.6** Transportation – all vehicles used to transport product must be verified clean and to not pose a GMO contamination risk. The diligence so done must be documented.
- 4.7** Contracted service providers - A current list of all service providers for the Organization shall be maintained.
- 4.7.1** Service providers for the Organization shall have contract agreements in place, which make references to relevant non-GMO control points.
- 4.8** The operation shall implement a hold and release program for each lot or batch that bears the FoodChain ID Non-GMO Certification.
- 4.8.1** An effective and documented recall/withdrawal procedure shall be in place for non-conforming products. And shall include at a minimum:
- 4.8.1.1** Emergency contact details for contacting FoodChain ID during a recall/withdrawal situation, with specifications that such notification shall occur within 48 hours;
- 4.8.1.2** A documented trial recall exercise performed at least once a year that is independent of a traceability test; and
- 4.8.1.3** Methods for retrieving and disposing of recalled/withdrawn product
- 4.9** All incidents of non-conforming product shall trigger a review of the corrective action procedure so that relevant changes are made to prevent recurrence. The results of such exercise shall be documented.
- 4.10** In the case where the operation discovers that a lot is non-conforming after the lot has left the certified operation's custody, the operation shall contact FoodChain ID immediately.
- 4.11** Additional measures for farming/crop production



**4.11.1** Crop production operations wishing to be certified themselves under the FoodChain ID Non-GMO Standard shall assure that the seed they use meets the targeted tolerance threshold set by this Standard.

**4.11.2** Testing of seed lots shall be for all possible GMO events for the species in question.

**4.11.2.1** Purchased seed must be received with proof of conformity and supported by test results in line with section 3 of this Standard, and this shall be documented by the farming operation.

**4.11.2.2** Seed saved by the farming operation itself and used for producing a crop that will not be sold as seed shall have been tested via PCR or through strip tests, and verified to be below the targeted tolerance threshold level for seed indicated in section 2 of this Standard. For lots to be sold as planting seed, PCR tests must be done in line with sections 2 and 3 of this Standard.

**4.11.2.2.1** If strip tests are the method used, the operation must demonstrate its proper use of the testing technology.

**4.11.3** Segregation of Seed Sources – Cropping practices and related procedures shall be in place to prevent previously planted GMO crops from germinating and contaminating fields intended for production of certified non-GMO crops.

*Guidance:* Organizations seeking seed as an input for growing as a grain or for seed production should consider that GMO presence in seed should be significantly below their selected Targeted Threshold Tolerance Level(s).

**4.11.4** Cropping practices shall take into consideration the potential for pollen drift from nearby GMO sources, and take all reasonable steps (eg staggering planting times, planting distinguishable varieties, instituting physical barriers, creating buffer planting zones, etc.) to avoid the chance for cross contamination.

**4.11.5** Areas that have been identified as a contamination risk shall have a written plan which provides the instructions to eliminate or reduce the risk.

**4.12** Additional measures for livestock production

**4.12.1** Livestock and/or animals (if applicable) Livestock and/or animals used for the production of FoodChain ID certified products shall be segregated from other livestock throughout their lifespan.

**4.12.1.1** Where appropriate, individual livestock and/or animals shall be marked or tagged to facilitate segregation.



**4.12.2** Livestock/Animals must pass through the following minimum conversion periods to qualify for FoodChain ID Non-GMO certification status:

Animal type	EU market	All other markets
Swine	4 months	Immediately after weaning; first solid food
Cattle, equidae, and other large mammals for meat production	12 months and at least $\frac{3}{4}$ of their life	Immediately after weaning; first solid food
Small ruminants	6 months	Immediately after weaning; first solid food
Livestock for dairy production <sup>a</sup>	3 months	30 days
Birds for egg production	6 weeks	From 2nd day of hatching
Birds for meat production	10 weeks	From 2nd day of hatching
Aquacultured animals	See "other farmed animals" below	At least the last two-thirds of their life.
Bees	Entire honey flow season, hives are isolated from GMO pollen sources for at least a 3km radius.	Entire honey flow season, hives are isolated from GMO pollen sources for at least a 4-mile radius.
Other farmed animals	From birth or 2nd day of hatching	From birth or 2nd day of hatching

\*Once converted, animals must be fed a non-GMO diet continuously.

**4.12.3** Animals certified to the FoodChain ID Standard shall not be fed GMO crops and shall be prevented from grazing on GM crops.

**4.12.3.1** Operations must provide FoodChain ID with their feed rations for the different life-cycle stages of all animals whose products are requested for certification.

**4.12.4** The use of GMO drugs or hormones for livestock and/or animals other than for medical reasons is prohibited.



## 5.0 Traceability

- 5.1** The operation shall have a traceability program to ensure that traceability can be demonstrated throughout the chain of custody both backwards (trace) and forwards (track) from inputs through work in progress to finished product.
- 5.2** The Organization shall annually test the effectiveness of the traceability program (including packaging/labeling) both backwards (trace) and forwards (track) to ensure traceability can be demonstrated.
- 5.3** Full traceability shall be achievable within 4 hours.
- 5.4** Processing or production records must include production period, ingredients and inputs used, input identification (lot or similar identifying number(s), amount, and product loss during processing.
- 5.5** The traceability program shall include primary packaging/labeling and raw materials relevant to its certified products.
- 5.6** A running mass balance and full inventory system shall be maintained for inputs and outputs correlating the amounts of compliant (or certified) inputs with amounts of certified outputs.
  - 5.6.1** The use of rework in the production of product certified to the FoodChain ID Non-GMO Global Standard must be recorded in the product mass balance.
  - 5.6.2** A running mass balance shall include identification of constituent batches and their proportions by lot number. A new lot number or proper identification must be assigned for the composite lot as well as for the composite or split consignment.
- 5.7** A procedure shall be in place for customer service and order fulfilment procedures to verify that the correct certified product consignments or product lots have been shipped to the correct customers.
- 5.8** All finished products in packages must be lot marked, enabling traceability to raw materials used in their production. Where the material is supplied in bulk, a unique lot identifier must be associated with each specific lot.
- 5.9** All goods shipped in bulk, where packaging or labels are not feasible, shall be duly identified on associated documentation with a lot or production code which allows for traceability back through all links in the chain of custody of the goods involved.



## 6.0 Quality Management, Training, Internal Audit, and Records

- 6.1** Responsible personnel shall establish and maintain and have available on all certified sites a written Quality Management System (QMS), which includes procedures, work instructions or Standard Operational Procedures (SOPs), and records that can demonstrate the organization's compliance with this Standard.

*Guidance:* It is helpful for the QMS to include an organizational chart and corresponding documented job responsibilities and functional positions for execution and implementation of the FoodChain ID Non-GMO Global Standard. Job responsibilities and functional positions should then be kept up to date and be clear for roles that impact its management systems. Functional positions should have nominated, trained Deputies as back-up whenever human resources allow; the organization should be able to demonstrate how Deputies are deemed competent to fulfill deputized roles.

- 6.2** The Organization shall be able to demonstrate how it stays current and up to date on scientific and technical developments, industry codes, and new legislation for the country in which the product is made and/or in which It is sold.
- 6.3** The organization shall ensure all that all documents relevant to the FoodChain ID Non-GMO Global Standard are kept current including changes to operations, facilities and procedures, and appropriately distributed to, understood, and used by all relevant personnel.

*Guidance:* A formalized document control system is highly recommended, which can be checked both internally by the organization as well as by FoodChain ID auditors, and which demonstrates how versions are distributed and used in a timely manner.

- 6.4** Internal Audit - An annual internal audit against the FoodChain ID Non-GMO Global Standard shall be carried out by the Organization to identify any areas of non-conformance.

- 6.4.1** The Organization shall have a documented internal audit procedure.

**6.4.1.1** The procedure shall identify those responsible for conducting the internal audit.

**6.4.1.2** The procedure shall include responsibilities for investigation into non-conformities resulting from the internal audit.

**6.4.1.3** The investigation into non-conformities shall include documented:

**6.4.1.3.1** Corrective action;

**6.4.1.3.2** Root cause analysis;

**6.4.1.3.3** Risk assessment; and

**6.4.1.3.4** Preventative measures.



- 6.4.2** A review of the effectiveness of corrective actions where non-conformities are identified shall be part of the corrective action program. The review shall include but not limited to the following:
- 6.4.2.1** Feedback and findings from internal audits;
  - 6.4.2.2** Legislative, technical, and industry developments relevant to the FoodChain ID Non-GMO Global Standard;
  - 6.4.2.3** Verification that the quality system, quality manual, procedures, testing methods, training programs, etc., are current and in compliance;
  - 6.4.2.4** Supplier performance;
  - 6.4.2.5** Corrective actions and out-of-specification product; and
  - 6.4.2.6** Customer complaints and complaint trend analysis.
- 6.4.3** A trend analysis shall be used to identify re-occurring non-conformance to eliminate the re-occurrence and assess risk of re-occurrence.
- 6.4.4** Contractors or subcontracted organizations performances shall be reviewed minimum annually, based on risk and be documented.
- 6.4.5** In organizations where adequate human resources exist, personnel involved in monitoring and assessing performance of the system shall be independent of the personnel responsible for the day-to-day production.

*Guidance:* Only in very small organizations with few personnel may an exception to the above clause be requested of FoodChain ID.

- 6.5** Records - Records and data shall be maintained for all processes essential for the integrity of the FoodChain ID Non-GMO Global Standard.
- 6.5.1** The Organization shall have a current, original hard copy or electronic version of the FoodChain ID Non-GMO Global Standard available.
  - 6.5.2** All records shall be legible.
  - 6.5.3** Records that have been amended shall be countersigned and dated by the person authorizing the change.
  - 6.5.4** All records used to demonstrate conformance to the FoodChain ID Non-GMO Global Standard shall be retained for a minimum of five (5) years.

*Guidance:* Longer retention of records should be considered for products with a long shelf line.



## **Annex A – Risk Crop, Animal, and Synthetic Biology Sources**

*Note: The following list also applies to derivatives of the sources listed herein.*

### **Crops**

- alfalfa
- apple
- carnation
- chicory
- corn or maize (except popcorn)
- cotton
- creeping bentgrass
- eggplant or aubergine
- papaya
- petunia
- pineapple
- plum
- poplar
- potato
- rapeseed or canola
- rice
- soybean
- summer squash
- sugar beet
- sugar cane
- sweet peppers
- tobacco

### **Animals**

- salmon

### **Products of synthetic biology**

- Cannabidiol (CBD)
- Spider silk
- Vanilla



## Annex B – Potential Risk Sources (non-exhaustive)

The following inputs carry potential risk due to cross-pollination with compatible known risk species:

- *Beta vulgaris* (e.g., chard, table beets) – risk from known risk sugar beets
- *Brassica napra* (e.g., rutabaga, Siberian kale) – risk from known risk canola
- *Brassica rapa* (e.g., bok choy, mizuna, Chinese cabbage, turnip, rapini, tatsoi) – risk from known risk canola
- *Cucurbita pepo* (e.g., acorn squash, delicata squash, patty pan squash, pumpkin, and spaghetti squash) – risk from known risk summer squash

The following inputs carry potential risk due to having been discovered via unauthorized or otherwise unmonitored escape in the field, or recent advent as experimental varieties:

- camelina
- flax (linseed)
- mushrooms
- mustard
- orange
- tomato
- wheat

## Annex C – Definitions

<b>Bioengineered</b> – A food or substance that contains genetic material that has been modified through <i>in vitro</i> recombinant deoxyribonucleic acid (rDNA) techniques and for which the modification could not otherwise be obtained through conventional breeding or found in nature. (US 7 CFR 66.1)
<b>Chain of Custody</b> - chronological trail showing the ownership, control, transfer and disposition of the product.
<b>Composted</b> – Decomposed over time by microbial and other life forms through favorable environmental conditions, to be usable as a soil amendment for further production.
<b>Consignment</b> - volume of a shipment of product changing custody or ownership in the supply chain, composed of one or more production lots, or split from a given single or composite lot. A consignment can be comprised of merged consignments and can be split into various consignments. Each consignment is assigned a unique identification number for traceability purposes and inventory control, linked to the original production lots.
<b>Contractors or subcontracted organizations</b> - a person or company that provides services or products to the certified Organization under a signed agreement or contract.
<b>Control Point</b> - a condition of which has been identified through risk assessment to eliminate failure of an identified risk. Control Points are most easily identified in the form of a process flow chart.
<b>Country of Origin</b> – The place where an input was grown.
<b>Distribution, Storage and Handling Operations</b> - services provided in relation to certified product whether by water, land or air including transshipment services which involve no physical change in the state of the product, its packaging, or its labelling





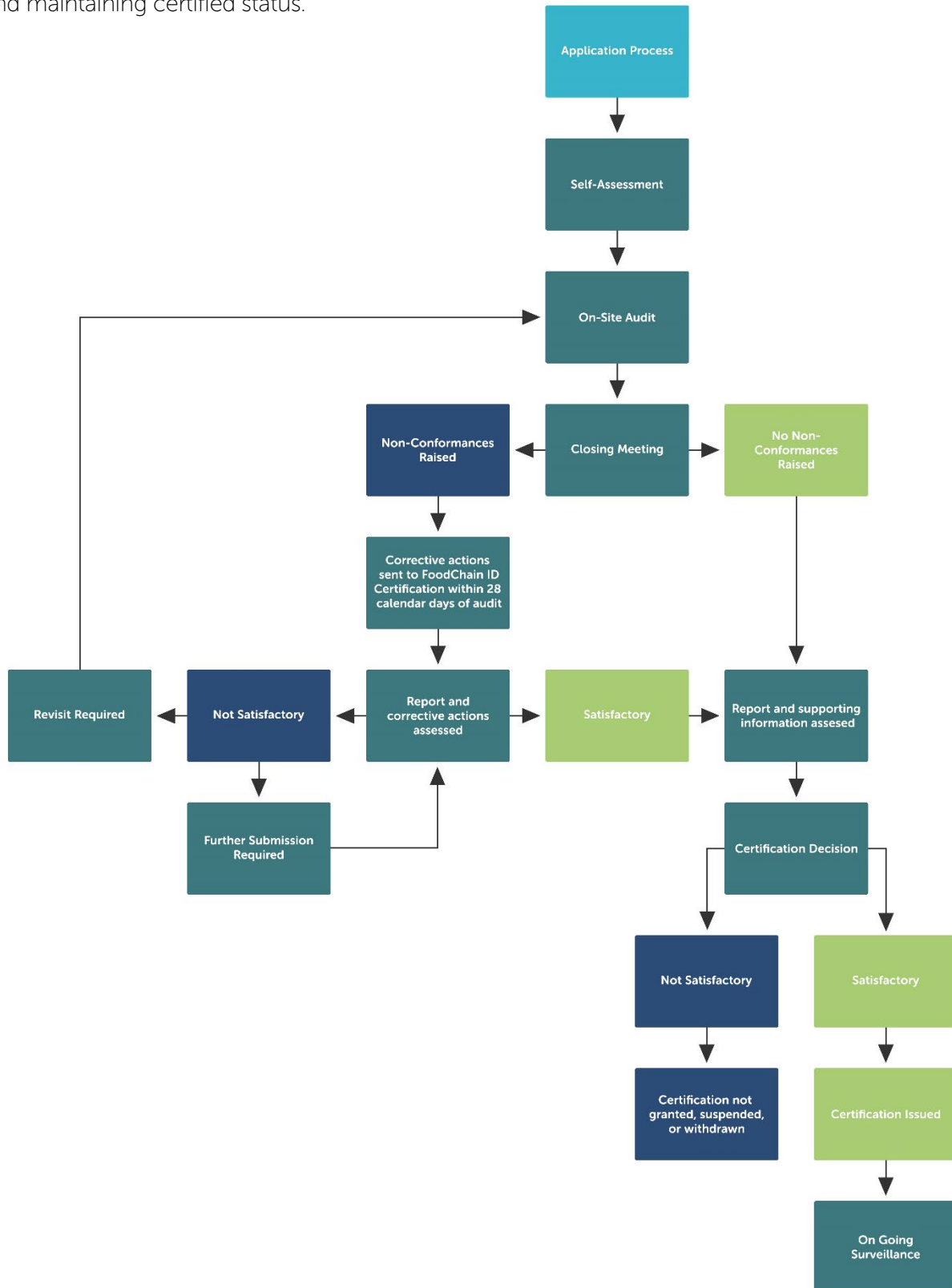
<p><b>DNA -Deoxyribonucleic acid (DNA)</b> - is a molecule that carries most of the genetic instructions used in the development, functioning, and reproduction of all known living organisms and many viruses.</p>
<p><b>Document Control Procedure</b> - a written procedure, which provides the ability to track documents within the organization's authority to maintain a record of revisions and removal.</p>
<p><b>GM (Genetically Modified or Genetic Modification)</b> - products or processes resulting from employing, modification of genes, DNA, or RNA, through gene splicing, gene editing, recombinant DNA technology, or transgenic technology. Also refers to products produced using one or more GM inputs or process elements.</p>
<p><b>GMO</b> - Genetically Modified Organism - A plant, animal, or other living organism, biological unit or molecular entity that is derived from genetic modification as defined in this Standard. This term will also apply to products derived from genetically engineered sources as well as those of synthetic biology. It is the use of a genetic engineering process that makes the organism (or its descendant) a "genetically modified organism", irrespective of whether the modification is currently detectable or cannot be differentiated from natural mutation or traditional breeding.</p>
<p><b>Identity Preservation/Identity Preserved (IP)</b> - use of segregation and traceability procedures to maintain the identity of specific lots of agricultural or processed products throughout all stages of production, maintenance, transportation, storage and processing. IP is primarily used to preserve the authenticity of defined traits or characteristics of products, one of which is the non-GMO status of the product.</p>
<p><b>Inputs</b> - any material or substance that becomes a part of the final product, or a component of which becomes a part of the product. These include the following:</p> <ul style="list-style-type: none"> <li>• Agricultural inputs, such as seeds;</li> <li>• Unprocessed agricultural products, such as vegetables, grains, fruit, greens, herbs, and other fresh foods etc.;</li> <li>• Feed components, such as grains, forage plants, vitamins, enzymes, minerals; and/or</li> <li>• Manufacturing and processing inputs, including ingredients, flavorings, seasonings, colorings, additives, enzymes and all other substances present in final, manufactured products, such as residues of processing aids.</li> </ul>
<p><b>Inspection</b> - an on-site audit, assessment or evaluation.</p>
<p><b>Isotope Analysis</b> - Most chemical elements exist as two or more isotopes. Isotopes of the same element have the same chemical properties but different mass and this affects various chemical, biological and physical processes. This can lead to small but measurable variations in the isotopic composition of the product/material, which is affected by climatic, geochemical, hydrological and anthropogenic factors at the site of production. Thus, each product/material acquires a natural marker, the so-called "isotopic fingerprint." This fingerprint is specific and cannot be easily altered by processing or by chemical additives.</p>
<p><b>Lot</b> - a volume of product originated in agriculture or in industrial processing and assigned a unique identification number identifying that production volume.</p>
<p><b>Non-GMO or Non-GM</b> - A plant, animal, or other organism or derivative of such an organism whose genetic structure has not been altered through methods defined in this Standard as GM or GMO</p>
<p><b>Organization</b> - means the company or legal entity that is seeking certification to the FoodChain ID Non-GMO Global Standard for specified location/s or site/s. Organizations hold title or ownership of a product even though it may or may not physically handle the product.</p>
<p><b>PCR Testing</b> - a biochemistry and molecular biology technique for isolating and exponentially amplifying a fragment or sequence of interest of DNA, via enzymatic replication, without using a living organism.</p>
<p><b>Processing aids</b> - (a) Substances that are added to a food during the processing of such food but are removed in some manner from the food before it is packaged in its finished form. (b) Substances that are added to a food during processing, are converted into constituents normally present in the food, and do not significantly increase the amount of the constituents naturally found in the food. (c) Substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food.</p>
<p><b>Product or Finished Product</b> - refers to products that are assessed as part of the FoodChain ID Non-GMO Global Standard certification process, which the certified Organization offers to the market, at whatever</p>



stage of the production chain (i.e. as a final consumer product, an ingredient for further manufacturing, a raw agricultural crop or commodity, etc.).
<b>Segregation</b> - the system of facilities, equipment, and procedures through which a certified Organization keeps FoodChain ID certified product physically separated from other materials.
<b>Shall or Must</b> - compliance with this requirement is mandatory.
<b>Should or May</b> - a non-mandatory requirement; the implementation of which will provide a greater degree of conformance and consistency of conformance to the IP requirements or conditions at a given step in the process.
<b>Standard</b> - the 'Standard' herein refers to the FoodChain ID Non-GMO Global Standard (i.e. this document).
<b>Strip Tests</b> – immunologically based screen-testing strip device which analyze the protein expressed by the DNA and used as a rapid method for the identification of GM presence.
<b>Supplier</b> - any party from whom an input is obtained.
<b>Synthetic biology</b> - the creation of novel, artificial nucleic acid sequences, biological components, organisms, systems, and technologies, usually through genetic engineering techniques.
<b>Targeted Threshold Tolerance Level or Targeted Tolerance Level</b> - a defined range of acceptable GM contamination levels found in a specified product for a specified region e.g. country.
<b>Traceability Certificate(s) of Compliance (TCC)</b> - an official document issued by FoodChain ID on behalf of a FoodChain ID certified seller for a lot or specific lot(s) of FoodChain ID certified product to a buyer. The TCC documents the actual chain of custody.

### Annex D – Certification Process

The flow diagram provides essential background information detailing the steps involved in gaining and maintaining certified status.





## Self-Assessment

As a first step to certification, it is recommended that the Organization carries out a self-assessment against the Standard to ensure that it understands the requirements and has the appropriate systems in place to meet those requirements.

Optionally, the Organization may request that a pre-audit be carried out by FoodChain ID to act as a gap analysis to identify any further work that may be required before the certification audit is requested. The service proposal issued by FoodChain ID will confirm its status as a pre-audit but will not lead to certification irrespective of the outcome. During a pre-audit, a FoodChain ID auditor can explain what the Standard expects in relation to its requirements but cannot offer specific solutions to the Organization where compliance is not demonstrated.

## FoodChain ID Application

Certification is sought through an application form provided by FoodChain ID. The application requests specific information related to its products and processes which are used to identify possible risks of GM contamination and to define the scope of your certification.

The Organization may be asked to provide FoodChain ID with background information prior to the audit to ensure the auditor is fully prepared and to provide the best opportunity for the audit to be completed efficiently. Information that may be requested may include but is not limited to:

- Organizational chart;
- Process flow diagram(s) related to non-GMO;
- Floor plan;
- Risk assessment plan which identifies GMO risks;
- Inputs and final products lists; and
- Sampling and testing plans.

## Service Proposal

A Certification proposal and agreement is provided for certification which will set out the certification plan, fee structure and payment terms and conditions. The Organization returns the signed agreement and proposal, agreeing to the audit and to commit to compliance with the Standard once certified.

## FoodChain ID Fees

Details of fees are provided with the certification proposal and agreement. Fees are dependent upon the nature of each Organization's requirements and if applicable, products to be certified.

## Audit

FoodChain ID will assign a trained auditor to complete the certification audit.



Your auditor will:

- Confirm your intentions set forth in your application for FoodChain ID certification during the opening meeting;
- Audit your Organization to determine compliance;
- Conduct a sampling of inputs or final product for validation of sampling protocols;
- Present overall findings of the audit; and
- Provide a list of findings to the Organization.

## Report

The auditor will produce and submit a written report of the audit, which will include:

- An introduction which summarizes the findings of the audit, the scope of audit, and details of the Organization; and
- Detailed audit findings for all the aspects observed during the audit.

The Organization will receive a copy of the report once the certification process has been completed.

Where the number or nature of any non-conformances raises doubt as to the effectiveness of systems or procedures, FoodChain ID may conduct a further on-site visit to verify corrective actions have been met.

## Corrective Action

The Organization will have 28 days to submit their corrective actions. Organizations submitting corrective actions after the 28 days may be required to undergo an additional on-site visit or forfeit their application for FoodChain ID certification.

## Certification

A certification decision will be made by FoodChain ID based on the report, corrective actions and closeout of non-conformances. If the decision is that certification is granted, a certificate will be issued to the Organization with an annual expiration date.

## FoodChain ID Trademark and Traceability Certificates of Compliance

Once certified, an organization may use the FoodChain ID Non-GMO logo on compliant products and/or request Traceability Certificates of Compliance (TCC) to be issued for each lot or batch of certified product to be sold to a named buyer.

The certified Organization's use of FoodChain ID Trademark is limited to claims regarding the certification scope. The certified Organization, by advising FoodChain ID, may request a change of scope from time to time in which case FoodChain ID reserves the right, with due justification, to re-audit at that time or at a later time and may require an additional administrative and/or audit fee.



Compliance with and certification to this Standard demonstrates the organization has the capability to produce, process, handle, supply, store and or distribute non-GMO materials, maintaining non-GMO Identity Preservation and traceability in accordance with this Standard. Certified organizations may request to apply the FoodChain ID Trademark which demonstrates the product is in conformance to the Targeted Threshold Level(s). Organizations may also request Traceability Certificates of Compliance or TCCs for lots or individual lots of product that are within the scope of their certification. TCCs are requested by the organization and are issued by FoodChain ID for the organization to forward to the purchaser of non-GMO materials as a PDF certificate providing an additional layer of assurance.

FoodChain ID Non-GMO Trademark and TCCs are issued according to the agreed Targeted Threshold Level(s) of the relevant markets in which certified products are sold.

FoodChain ID Non-GMO certified organizations are provided with TCCs consistent with the incoming TCC from their FoodChain ID certified supplier. A TCC for product originally with a lower threshold tolerance would qualify as in compliance with a region that has a higher threshold tolerance but not the other way around.

The certified organization agrees not to use its certification in such a manner to discredit FoodChain ID or make statements regarding its product certification which FoodChain ID may consider false or misleading or otherwise unauthorized. Use of the FoodChain ID Trademark in any media including but not limited marketing materials, specifications, datasheets, websites electronic or hardcopy shall not mislead.

Additional information regarding FoodChain ID trademark use is detailed in the document entitled, "FoodChain ID Certification Non-GMO Trademark Rules of Use<sup>5</sup>."

### **Maintenance of Certification**

FoodChain ID will contact the Organization prior to annual expiry. This is generally 5 months before the expiration date of the current certification certificate. If recertification is not sought, the use of the FoodChain ID certification certificate and logo, if applicable, shall cease on its annual expiry date and no new claims related to the FoodChain ID status shall be made. It is the responsibility of the Organization to maintain certification.

### **Suspension of Certification**

If the certified Organization cannot provide satisfactory objective evidence of corrective actions to discharge non-conformances, certification may be suspended or withdrawn. If FoodChain ID becomes aware of circumstances that raise doubt as to the ability of the certified Organization to meet the responsibilities and requirements of the Standard, it may ask the Organization for further information to clarify the situation. If no satisfactory explanation or assurances are received, FoodChain ID may revoke, suspend or withdraw certification. Organizations may also choose to withdraw from the program through a formal withdrawal request in writing.

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<sup>5</sup> Applies to the most recent and active version of this document.



## Complaints

Organizations have the right to file a complaint. Complaints should be submitted in writing to FoodChain ID, detailing the nature of the issue, the personnel involved, and any relevant dates. Complaints will be handled according to FoodChain ID’s complaint procedure.

## Appeals

Should an Organization disagree with the certification decision, it has the right to appeal. Appeals shall be submitted in writing, stating the decision made by FoodChain ID and the reason for dispute. Appeals shall be submitted to FoodChain ID. An Appeals committee will be assigned to adjudicate the matter. The decision of the committee will be final. In circumstances of suspension, withdrawal, complaint, or appeal, the Organization will be informed in writing of the action taken/decisions made. FoodChain ID will not reimburse any fees incurred.

## Annex E – REVISION HISTORY

Revision History			
Title	Date	Notes	Version
Certification Programme for Organisations Supplying Non-Genetically Modified Soya and Maize Products and Derivatives and their Inclusion in Finished Products	June 1999 - November 2002	Original standard designed for soya and maize	v1.0 - v3.0
Cert ID Non-GMO Certification Program	March 2004	Conversion from grains to all products	v4.0
Cert ID EU Regulatory Compliance Certification Program	March 2004	Standard related to EU Regulation requirements	v4.0
Cert ID Non-GMO Standard	November 14 2008	Additional guidance notes added	v5.1
Cert ID EU Regulatory Compliance Standard	October 1 2008	Additional guidance notes added	v5.0
Cert ID Non-GMO Global Standard	June 27 2017	Combined Non-GMO Standard and EU Regulatory Compliance Standard. Implementation of threshold tolerance levels.	v6.0
FoodChain ID Non-GMO Global Standard	July 16, 2018	Re-issued as FoodChain ID Non-GMO Global Standard	v6.1
FoodChain ID Non-GMO Global Standard	April 5, 2019	Additional requirements regarding gene editing and related techniques	V6.2

