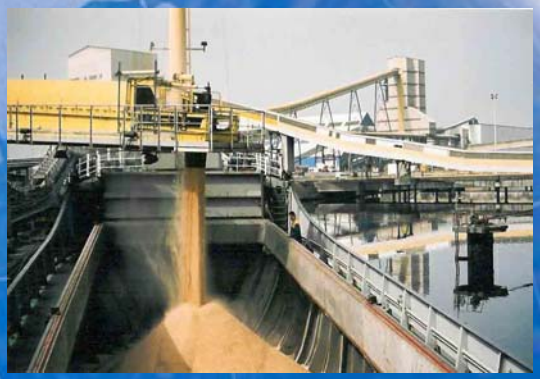

Non-GMO Certification Standard

Version 5.1

- STANDARD -

Cert ID Non-GMO Certification Programme

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Contents

Purpose of the Cert ID Non-GMO Certification Programme

The aim of the programme is to provide organisations with independent, third-party certification services verifying that their production and handling systems, quality systems, and products are “Non-GMO,” meaning that they comply with the Cert ID Standard for excluding GMOs. This certification also verifies compliance with EU regulations related to labelling and traceability of GMOs.

To achieve this, Cert ID has established this Standard to enable the certification of traceability and identity preservation systems and of Cert ID compliant products.

The Cert ID certification programme is not only a control and verification for the food and feed industry, but also a means to demonstrate to consumers that suitable controls are in place, thereby enhancing consumer confidence. Cert ID certification programmes are designed to add value at every point along the food chain, from the seed producer and farmer, to the manufacturer and retailer, giving assurance to the successive elements of the food chain, and ultimately to the consumer.

In the event of a claim or challenge relating to a Cert ID certified system or product Cert ID will, if required, provide support to any certified client.

Scope

The Standard covers the procurement, production, handling, processing, storage, distribution, and labelling of foods and agricultural products of plant, animal, and microbial origin.

This document sets out the following requirements to be met by organisations seeking certification status under this Standard:

- Risk assessment
- Organisational responsibilities
- Operational procedures and work instructions
- Quality Assurance systems, procedures, and specifications
- Systems auditing, corrective action methods, and change processes
- Record keeping requirements, maintenance, and retention time
- Training requirements and documentation
- Purchasing requirements and records
- Product and materials specifications
- Traceability
- Identity preservation practices and segregation of non-conforming product and materials
- Sampling and testing regimes
- Labelling and claims

Definitions

Cert ID	A global organisation providing third-party certification programmes to growers, agricultural processors, food ingredient producers, food manufacturers and food retailers. Cert ID certification verifies to buyers that the purchased product was produced in compliance with the Standard.
Cert ID Approved Laboratory	A laboratory that is a member of the Global Laboratory Alliance (GLA) or licenses and uses standardized operating procedures established by the GLA.
Conveyance	Any vehicle or container whether for use on land, sea or air which is used for transporting product between or within growing, production or storage facilities.
Dedicated	Used only for the storage, handling, transport, distribution, production or processing of Cert ID non-GMO product.
Distribution, Storage and Handling Operations	Services provided in relation to Cert ID certified product whether by water, land or air including transhipment services which involve no physical change in the state of the product, its packaging, or its labelling.
Facility	A building or other self-contained unit containing storage, processing or handling equipment.
Global Laboratory Alliance (GLA)	A network of laboratories employing a standardized set of genetic testing methods for GMO detection and quantification, administered by Genetic ID.
GM	Genetically Modified or Genetic Modification – A term referring to products or processes employing gene splicing, gene modification, recombinant DNA technology, or transgenic technology or using products thereof either as inputs or as process elements.

GMO or Genetically Modified Organism	A plant, animal, or other organism whose genetic makeup has been modified using recombinant DNA (gene splicing) methods. Refers to products derived from a species of which GM varieties have been commercialized somewhere in the global production system.
Identity Preservation / Identity Preserved (IP)	Use of segregation and traceability procedures to maintain the identity of specific lots of agricultural or processed products throughout all stages of plant, animal, or other organism production, maintenance, transportation, storage, processing, and final product production. 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.
Inputs	Any ingredient, raw material or seed.
Non-GMO or Non-GM	A plant, animal, or other organism or derivative of such an organism that has not had its genetic structure altered by gene splicing, or a process or product that does not employ GM processes or inputs.
Organisation	The company, facility or operation seeking certification.
PCR testing	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.
Shall or Must	Compliance with this requirement is mandatory.
Should or May	A non-mandatory recommendation, 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.

Site	A defined and delineated area on which storage or manufacturing facilities are located.
Standard	“the Standard” herein refers to this document - the Standard for the Cert ID Non-GMO certification programme.
Supplier	Any party from whom an input is obtained.
Traceability Certificate of Compliance (TCC)	An official document issued by Cert ID on behalf of a Cert ID-certified seller to a buyer at the time the buyer receives a specific lot or lots of Cert ID-certified product, The TCC is specific for the lot of material received by the buyer, and links the lot number of that material to specific quantities of that material, results of genetic testing conducted on that lot of material, and documents the actual chain of custody of that lot of material preceding the time that it was received by the buyer.
Where appropriate	In relation to a requirement of the Standard, the company will risk assess the requirement of the Standard and put in place systems, processes, procedures or equipment to meet the requirement. The company shall be mindful of legal requirements.

Requirements

Explanation of Layout:	
The requirements of this Standard are formatted in two columns. The left-hand column contains clauses of the Standard itself. These are the specific requirements of the Standard that must be met in order to gain certification. The corresponding right-hand column contains Guidance notes that are included to help interpret and explain the intent of the given Standard clause, offer additional relevant details, and/or place the clause into the context of current realities. Guidance notes should be read along with the Standard's clauses and must be followed accordingly. Where no Guidance is offered, the Standard alone suffices. Sections 1 – 6 apply to all operations seeking certification. Sections 7 and 8 are additional requirements for agricultural and livestock husbandry operations. Throughout this document, key topics are indicated in **bold type.** *These define the key elements that are the central pillars to support a system that will meet the requirements of the Standard and planning for compliance must focus on these principles.*	
STANDARD	**GUIDANCE**
1.0 RISK ASSESSMENT	
1.1 Carrying out the risk assessment	
1.1.1 All organisations must carry out a **risk assessment** irrespective of their position in the non-GMO supply chain, as a key step in implementing of Cert ID Non-GMO System.	Risk analysis is the key step to be used to identify the critical points at which contamination can occur and to ensure that the appropriate controls are in place to effectively manage the risks. The Standard requires that the controls are validated. This will normally be done by PCR testing to prove that the measure that was designed has been effective in eliminating GMO cross-contamination.
1.1.2 The organisation must examine and analyse its processes and develop a systematic documented risk assessment showing all stages of the operation. This must cover the entire operation including where applicable, agricultural operations, processing, storage, handling and distribution facilities. The risk assessment shall include known and foreseeable risks within the supply chain	The requirement here is to first define the entire process whether it is agriculture, storage, distribution, manufacture or a combination of these. The production of a flowchart detailing the steps in the process is the recommended way of doing this. Working methodically through the flowchart we are looking to identify any

as well as within the operation itself.	point where cross-contamination can occur and implement a control measure to stop it occurring.
1.1.3 The risk assessment shall be used to identify the control points at which potential cross-contamination of the IP process may occur.	
1.2 Implementing the results of the risk assessment	
1.2.1. Appropriate measures must be developed for each identified control point to ensure that cross-contamination does not occur.	The measures can be the establishment of a dedicated site, facility or equipment; segregation, cleaning, flushing with Cert ID compliant material (which must then be diverted to commodity grade) or a combination of these. For example: a site may have two separate, self-contained production units, one for non-GMO, and the other for GMO or non-specific product. Although this represents a dedicated production facility it is not a dedicated site. Regard must be paid to each element of the operation and how they interact. For example: all points may have been considered apart from a shovel loader that operates with both non-GMO and commodity material. If no provision is made for inspecting and cleaning that equipment, cross-contamination may occur.
1.2.2 All practices, processes, facilities, and procedures – from seed to finished product - shall be designed to minimise the risk of system failure and to ensure maintenance of the integrity of the IP process through all IP process control points. This shall take account of the risks posed by seed supply, adjacent crops, harvesting practices, post-harvest handling, processing, storage, labelling, and transport at any and all stages of the production chain, as applicable to the operation seeking certification.	Equipment, facilities, and conveyances should be assessed to identify any problematic areas, such as places where materials can be trapped, contributing to later contamination.

1.2.3 The process for product change to non-GMO production must be defined by means of a plan as the result of the risk assessment detailed above. The plan shall ensure that during the receipt, production, storage, transfer, and transport, procedures shall be in place and facilities and equipment shall be configured so as to effectively segregate Cert ID-compliant inputs, product intermediates, and finished products from all other inputs, intermediates, and finished products.	
1.2.4 Any identified processes, changes to operations and facilities and procedures needed to comply with this Standard shall be fully implemented.	
1.2.5 Where flushing of equipment with non-GMO product is used as a means of segregation documentary evidence shall be available to demonstrate that the quantity of product specified for flushing is sufficient to ensure that the possibility of cross-contamination is eliminated.	This refers to the validation of the **quantity** of NGMO material used for flushing. Objective scientific evidence must be available to demonstrate **why** the chosen quantity is adequate.
1.2.6 Where a distribution, storage or processing operation has been converted from GM or non-specific status, the change must be validated to verify that the process has been successfully converted to production of Cert ID Non-GMO product.	The Standard requires that the changes made are validated. This is normally done by PCR testing to prove that the measure that was designed has been effective in eliminating GMO cross-contamination. The samples taken for testing shall take account of work-in-progress and final products at critical points in the production system. The Cert ID auditor shall verify that the sampling and testing regime used is consistent with the nature of the products and with the physical and operational configuration of the operation, and that the testing indicates that conversion has been successful in that the system is delivering product that consistently meets the Cert ID Non-GMO Standard.

1.2.7 A sampling and testing protocol shall be developed that validates the process. Testing must be conducted according to a Cert ID-approved method, consistent in its performance with the objectives of the Cert ID certification programme.	
1.2.8 Hard copy or electronic records shall be maintained to document the successful conversion and validation of the process for use in the production of Cert ID compliant products.	
1.2.9 The risk assessment shall be regularly reviewed at least every 12 months and whenever any change takes place that may affect the non-GMO status of the product.	Changes that may affect non-GMO status include (but are not restricted to): • Change in raw materials or supplier of raw materials • Change in ingredients/recipe • Change in processing conditions or equipment • Change in storage or distribution conditions • Change in staff or management responsibilities • Developments in scientific information associated with ingredients, process or product • The availability of GM varieties of the material in question

2.0 QUALITY MANAGEMENT SYSTEM	
2.1 Policy statement	
2.1.1 The organisation shall have a **policy statement** that demonstrates the company's commitment to Cert ID Non-GMO Certification. The policy statement shall be signed by a member of the senior management of the company and be regularly reviewed.	The policy statement is the foundation of the quality management system. It is the demonstration of commitment from the highest level within the business.

2.2 Quality manual	
2.2.1 The organisation shall establish **written systems**, procedures and records to manage the production process and the risks associated therewith to ensure that products produced meet the requirements of the Cert ID programme. This requirement shall apply to all processes relevant to the Cert ID Non-GMO Certification programme.	The quality system must be written down. The Standard is not prescriptive about the form this should take. Different companies will want to structure their systems in different ways. Some may use paperless systems others may have classic quality manuals. In certain cases the procedure for carrying out a given operation may be combined with the record. The need here is for systems that control the Cert ID requirements effectively without dictating how that should be done. It is anticipated that in most cases the extra controls required for the implementation of the requirements of the Cert ID Standard will be incorporated into the existing systems and procedures already in place to manage quality assurance within the business. Similarly with regard to the policy statement, this may either deal only with the company's non-GMO status or the principle by which this is established may be incorporated into a generic policy statement. Whilst it is not necessary for a full quality management system to be in place it should be borne in mind that an organization that does not currently operate formal controls over its other processes is unlikely to understand the principles required to implement a Cert ID non-GMO product management system.
2.2.2 The systems and procedures established shall: • specify the control measure to be taken; • specify how it is to be carried out; • specify who carries it out; • ensure that a record is kept of the control measure taken and where the control measure is quantitative, of the results of	

the check • be sufficiently detailed to ensure the effective operation of the non-GMO programme; and • be fully implemented	
2.2.3 The organisation shall **identify those functional positions and persons that have authority** for policy management and execution of the Cert ID Non-GMO Certification programme. The responsibilities for these positions shall be specified in writing. The organisation shall specify in writing a deputy for each functional position to cover absence of the principal responsible person.	
2.2.4 All procedures, work instructions, critical documents, reference materials, and specifications shall be readily available to personnel managing and executing the Cert ID Non-GMO certification programme at the location where reference to the information is required.	
2.2.5 The organisation will have systematic procedures for controlling the status, revision, amendment, replacement, and distribution of all documents relevant to the Cert ID Non-GMO certification programme.	
2.3 Records and data	
2.3.1 Records and data shall be maintained for all processes, procedures, monitoring, analyses, and measurements critical to the integrity of the Cert ID Non-GMO Certification programme.	
2.3.2 Where it is necessary to amend records, this shall be authorised and justified. The person authorising the change shall sign the amendment.	
2.3.3 Records and data shall be systematically managed in a manner that allows ready and efficient access.	
2.3.4 All records shall be legible and shall be retained for a period of at least five years from date of completion.	

2.4 Monitoring the non-GMO management system	
2.4.1 The organisation shall monitor the operation of the Cert ID non-GMO programme to assure that all processes, procedures, segregation, traceability, and record keeping critical to the Cert ID Non-GMO programme are operating effectively. **Monitoring procedures** shall include the supervision of operations, auditing of records and statistically valid sampling and testing where appropriate. Sampling and testing protocols shall be defined.	The frequency and scope of monitoring, sampling, and testing shall be determined based on risk assessment. There is a distinction between monitoring, internal audit and review in that monitoring is the day to day activity of making sure that processes, records etc are being carried out and completed correctly. It may also involve physical testing to verify that the programme is operating correctly. Internal audit is an independent verification that the systems and procedures in place are actually being followed. Management review involves taking a long term look at the business itself and the systems and procedures in place to decide if they remain appropriate to the way the business currently operates. This should take account of: • Changes within the business itself • Major external factors such as reduced availability of non-GMO raw material. • Technical and legal changes affecting the business particularly those relating to GM issues. • Problems that have been encountered within the last period with suppliers, internally and with customers. • Issues identified through both internal and external audits. The review should examine these and other relevant areas and set out an agenda of action points to deal with the issues identified. Evidence should be available that points raised have been closed out.

2.4.2 On a risk-assessed basis, and no less frequently than annually, a full and complete **internal audit** shall be carried out by the organisation of all aspects of the quality system, quality manual, procedures, test results, and all other data relevant to the performance of the Cert ID Non-GMO certification programme.	These internal audits may form part of an overall internal audit programme covering other operations within the business.
2.4.3 The internal audit shall include trial recall exercises and trial product trace exercises to assess the effectiveness of the record management system and adequacy of traceability within that system.	
2.4.4 Results of ongoing internal monitoring and of the annual internal audit shall be delivered promptly to all relevant individuals within the organisation. The quality system must identify the relevant individuals.	
2.4.5 Any non-conformances identified through internal audit shall be corrected within a timescale agreed with staff responsible for that particular activity. Corrections shall be documented.	
2.4.6 Quality assurance personnel involved in monitoring and assessing performance of the system shall be independent of the personnel operating the production system.	
2.4.7 A **management review** shall be conducted not less than annually. The review shall include (but not necessarily be limited to) the following activities: • The results of internal audits. • Legislative, technical, and industry developments relevant to the Cert ID programme. • That the quality system, quality manual, procedures, testing methods, training programmes, etc., are current and in compliance. • Supplier performance. • Corrective actions and out-of-specification product.	This management review may be part of a broader management review of other aspects of the quality systems.

2.4.8 The company shall use monitoring, auditing, and test results together with **customer complaint trend analysis** as the basis for continuous improvement of the Cert ID-compliant production system. In particular, significant non-conformances shall trigger immediate corrective action not only to identify the cause of the problem, but also to put in place measures which will reduce the risk of recurrence.	
2.5 Corrective and preventative action	
2.5.1 Procedures shall be in place to document and investigate non-conformities in processes, procedures, or products which are critical to non-GMO status and to define and implement appropriate **corrective actions**. Corrective action shall be carried out in a timely manner.	The requirements are mostly self-evident but the key requirement is that any incident involving actual or potential GMO cross-contamination results in action being taken in accordance with the corrective action procedure. In some cases the procedures may specifically refer to GMO/NGMO issues, in others they may just be regarded as one of a number of issues that can give rise to the use of the procedure.
2.5.2 Procedures shall be in place designating those responsible for making the decision to take corrective action, defining the criteria upon which that decision is to be based, specifying the procedure for implementing the corrective action, and verifying successful completion of the corrective action.	
2.5.3 All corrective actions shall be fully documented, identifying: • the nature and cause of the nonconformity, • the names of the personnel responsible for reporting, resolving and verifying the close-out of the non-conformity. • details of the segregation and disposition of nonconforming products and material. • changes made to systems and procedures to avoid re-occurrence of the non-conformity.	Repeated non-conformity shall be considered an indicator that elements in the production or quality systems or procedures may be faulty and may need to be amended, and will trigger review of relevant elements of the production and quality systems. If amendment is warranted, this shall involve not only amendment of processes, quality systems and procedures, but also revision of training procedures and appropriate retraining of personnel.

2.5.4 Procedures shall ensure that product lots that do not meet the Cert ID Non-GMO Certification programme Standard are securely segregated from the certified production stream and products.	
2.5.5 In the event of accidental mixing of GM and Cert ID-compliant material, Cert ID must be informed of the incident and the action taken to rectify it within two working days of the incident.	Such an incident should inevitably trigger the corrective action procedure and should result in a review of the systems and procedures in place to identify any changes required to prevent a repeat of the incident.
2.5.6 A **recall/withdrawal procedure**, verified to be effective, shall be in place. The procedure shall be sufficiently detailed to allow the responsible personnel to execute product recalls and withdrawals effectively, efficiently, and in a timely manner. Details of the recall shall be recorded and reviewed to identify any improvements necessary.	Product recall requirements for GMO/NGMO incidents are likely to be part of a wider incident management plan. The key requirement with regard to the Standard is that Cert ID must be informed in the event of a recall. Procedures should therefore contain this specific requirement including appropriate Cert ID contact details.
2.5.7 The ability of the programme operators to successfully and completely execute product recall/withdrawal according to the designated procedure shall be tested as part of the annual internal audit, or more frequently on a risk-assessed basis.	If a genuine recall has taken place it may not be necessary to conduct a test recall in that year.
2.5.8 Details of the operation of the recall test shall be documented and the results of this shall be reviewed and improvements implemented as required.	
2.5.9 The decision to recall or withdraw product shall be taken by designated persons within the organisation.	
2.5.9.1 Such designated person(s) shall promptly notify Cert ID of the problem and the intended action before that action has been taken.	The intention here is for the company to consult with Cert ID beforehand to verify that the proposed action will be sufficient.

2.6 Training	
2.6.1 All employees managing or executing any part of the Cert ID Non-GMO Certification programme shall take part in an appropriate **training programme** that will enable them to understand the aims and objectives of the programme. The training shall consist of at least the following two elements: • GM awareness; and, • The specific role and responsibilities of the employee in relation to the Cert ID Non-GMO Certification programme. The training covering the role of the employee shall include the processes and procedures involved in the programme as a whole, the employee's specific tasks as part of that programme, and the criteria indicating successful performance of the employee's designated tasks and responsibilities.	Two elements are required for the training, GMO awareness and training in the systems and procedures that support the non-GMO controls. GM awareness is important to ensure that employees are aware of why the implementation of those controls is important. The only situation in which it would be acceptable for no GMO specific training to be carried out is in a situation where there is no possibility of non-GMO cross-contamination. This might possibly be in a territory where the growing of GMOs is prohibited. Refresher training is needed to maintain the required level of awareness. It is for the company to set the level and the auditor to verify that it is adequate. This is likely to be evident by observing whether or not employees carry out their roles as specified.
2.6.2 The training programme shall be systematic, structured, and documented. Training documentation will include: • Systematically structured procedures for conducting training of staff. • Programme policy statement and quality documentation. • Job descriptions for each employee engaged in the management and/or execution of the Cert ID Non-GMO Certification programme. • Standard operating procedures and detailed work instructions for all programme-critical activities. • Any other supporting documentation, information, and data needed for effective execution of all tasks and responsibilities related to the programme.	

2.6.3 Changes in processes, procedures, and revisions of documentation require a training update for the staff responsible for those elements of the programme.	Training updates shall focus on those aspects of the process that have been changed, and will redefine the tasks that staff members must carry out under the changed regimen.
2.6.4 Refresher training shall take place at appropriate intervals to ensure that staff maintain the required level of knowledge for the effective operation of the programme.	
2.6.5 Training records shall be maintained for each staff member.	
2.6.6 Training records and refresher training records shall detail the person who delivered the training and the persons who received the training.	
2.6.7 Training records shall be retained for at least five years including evidence of refresher training.	

3.0 CONTROL OF INPUTS	
3.1 Demonstrable evidence must be available that all inputs used in Cert ID certified products meet the requirements of this Standard.	This section sets out all the requirements for inputs. Inputs will cover a wide variety of materials. It will include seeds, basic raw materials and low-level ingredients. Remember that one company's finished product is another company's raw material.
3.2 Procurement of inputs	
3.2.1 All inputs used in the production of Cert ID certified products must be from one of the following sources: **3.2.1.1** Primary agricultural products which have been purchased directly from growers and meet certain basic principles for non-GMO production. These controls shall be effected by means of:	A number of acceptable methods of meeting the requirements of the Standard in respect of inputs are set out here. The three methods are ranked in their order of desirability. The third option needs more work on behalf of both the client and the auditor. The client is expected to go much further to demonstrate that the materials are Cert ID compliant. Where the material is

• a contract between the procurer and the grower(s) which specifies the key steps as defined in Section 8 (Special Requirements for Agricultural Production) to ensure compliance with these principles, or, • by audits of growers conducted by or on behalf of the procurer, • a combination of these methods. In all above cases documentation consisting of traceability data and the results of tests of product verifying compliance with the Cert ID rejection threshold of 0.1% shall be available. **3.2.1.2** Material from Cert ID certified sources which is accompanied by a Traceability Certificate of Compliance (TCC) (Cert ID certified product) **3.2.1.3** A specific lot of material from a Cert ID certified source for which the certified organization has in hand a certificate of analysis demonstrating that the GMO content of that specific lot of material is less than 0.1%. Testing must be conducted by an approved laboratory. **3.2.1.4** A specific lot of material from a non-Cert ID certified source for which the certified organization has in hand a certificate of analysis demonstrating that the GMO content of that specific lot of material is less than 0.1%. Testing must be conducted by an approved laboratory.	not from a Cert ID certified source it is the responsibility of the company to make available to the auditor sufficient documentation that will demonstrate that the product can be traced back to non-GMO seed through an identity preservation system that provides an equivalent level of segregation to that required under the Cert ID Standard. This section recognises the fact that in most cases the product which comes within the certification scope will have originated from plant material in some form or other. The requirements of the Standard that relate to agricultural inputs need to be in place whether directly implemented by the certified company or achieved by them through the use of contracts with their growers that require adherence to these points. Segregation of growing non-GMO crops is a key feature of establishing an identity preservation system. Based on a survey of fields nearby those fields where the production of Cert ID-compliant crops is intended, the grower will design a risk-assessed isolation programme using distance and physical barriers, as well as timing of planting of the Cert ID-compliant crops, such that receptivity to pollen from neighbouring GMO fields will be minimised. The Traceability Certificate of Compliance is an integral part of the Cert ID audit system. These attest to specific lots having been produced in accordance with the practices required by this Standard. For compliance according to 3.2.1.4 and 3.2.1.5 below, supplier-generated declarations or affidavits of

3.2.1.5. A specific lot of material from a non-Cert ID certified source which, itself has not been tested, but for which the certified organization has in hand (a) traceability documentation linking that specific lot of material back to a specific lot of precursor that has been shown by test to contain less than 0.1% GMO, and (b) a copy of the actual certificate of analysis for the testing referred to in (a). Testing must be conducted by a Cert ID approved laboratory.	compliance with the 0.1% threshold are not sufficient. Actual certificates of analysis, generated by an approved laboratory are required. 3.2.1.4 and 3.2.1.5 will be particularly relevant where it is necessary to use 'spot' purchased material.
3.3 Specifications	
3.3.1 Clearly defined specifications shall be in place for all inputs to the production process and final products, and, where appropriate, for work in progress and rework. Specifications must require the material to meet the requirements of the Cert ID Non-GMO Certification programme including traceability, segregation, and compliance with a 0.1% threshold for GMO content.	Specifications are required to be in place to confirm that the raw materials meet the non-GMO contamination threshold set out in the Standard.
3.3.2 Clearly defined specifications or service plans shall be in place for all services and/or products provided by subcontractors. Services subcontracted to another organisation shall be undertaken in compliance with all aspects of the Cert ID Non-GMO Standard.	See also section 3.6.1
3.3.3 Specifications shall be reviewed at least annually to ensure that they remain current.	

3.4 Validation of inputs	
3.4.1 All inputs intended for use in production of Cert ID Non-GMO certified products must be accompanied by sufficient identification, traceability, composition documentation, and other information including, where appropriate, test records, to verify that the input meets Cert ID Non-GMO specifications. This requirement applies irrespective of whether or not the input is considered to have GMO risk. Traceability information must identify the input by means of a unique identifier and include details of the supplier, the amount of product received and the date of receipt.	
3.4.2 Data, principally related to traceability and segregation, shall be available verifying that the suppliers, producers and operators have taken steps to avoid the presence of GM materials. This must demonstrate that they have intentionally used non-GM inputs in producing the product and that production has been carried out according to an identity preservation system that has been verified to operate in compliance with the Standards of the Cert ID Non-GMO Certification programme.	
3.4.3 PCR testing according to a Cert ID-approved method, consistent in its performance with the objectives of the Cert ID certification programme must verify that GMO content by ingredient is less than the following maximum threshold values: a. GMOs fully authorised for human food and/or animal feed use – 0.1% b. GMOs not covered above shall not be detectable. For products destined for non-EU countries, relevant local regulations shall be considered.	

3.5 Source of inputs	
3.5.1 Inputs used in products certified under the Cert ID Non-GMO Certification programme shall not be produced from or with genetically modified materials or derivatives thereof even if the genetically modified material is not present in the final product.	
3.5.2 A micro-input is one that comprises less than 0.3% of the product. Water added during processing and/or manufacturing shall be excluded from the calculation of the percentage of the inputs in the final product. A micro-input is acceptable for use in a Cert ID certified product if it complies with EU regulations for labelling and traceability of GMOs. Specifically, these are as follows: a. The adventitious or technically unavoidable GMO content of micro-inputs shall be less than 0.9% for GMOs fully approved for human food and/or animal feed use in the EU. b. Presence of GMOs not approved in the EU and not covered by point (a) above, is not allowed.	The requirements for low level inputs recognise the practical difficulties that affect minor ingredients which are used in very small quantities within the product. This section broadly follows the requirements that apply.

3.5.3 Where no alternative is available that is not produced using GM technology micro-inputs may be produced with inputs, processing aids, etc. that are genetically modified but are not covered by points (a) and (b) above, provided the genetically modified material does not remain in the final product. Cert ID interpretation of "from" and "with" shall follow the current interpretation of EU authorities. The above requirement may be subject to further restriction in n non-EU markets if required by the regulations of such markets.	Food and feed produced by a fermentation process using a GMM (genetically modified microorganism) which is kept under contained conditions and is not present in the final product are not included in the scope of this regulation. These food and feed are considered as having been produced with the GMM, rather than from the GMM. For instance, a GM microorganism may be used to produce the micro-input as long as the micro-input is separated from the microorganism before use. The guiding principle is that a Cert ID certified product may not appear in the market as such if it also has the words "contains GMOs" or similar.
3.5.3.1 Justification must be available to demonstrate that no equivalent input produced without the use of GM technology is available.	
3.6 Supplier approval	
3.6.1 Any sub-contracted operation whose handling procedures may potentially contaminate Cert ID certified product must be certified.	This includes any operation that stores, transforms product in any way or alters packaging or labelling of certified products. Any operation that also handles product for non Cert ID certified customers would fall into this category.

3.6.2 Where a supplier or contractor is not Cert ID certified, procedures shall be in place to verify their ongoing ability to supply product that meets the requirements of the Cert ID non-GMO programme. The procedure for supplier approval must be formalised and records must be kept.	
3.6.3 The approval procedure shall be based on a system of on-site inspections and/or supplier questionnaires and/or testing. Risk assessment shall be used to determine the required elements in every case and the frequency and type of ongoing surveillance.	
3.6.4 Supplier performance shall be reviewed at least annually to ensure that suppliers continue to meet the required Standard.	

4.0 SEGREGATION	
4.1 Adequate **segregation** shall be in place to ensure that the non-GMO status of materials is maintained throughout the supply chain. The nature of the segregation shall be appropriate for the operation's place in the supply chain and the type of production or handling	This applies to all stages of the supply chain, from seed to finished product and includes growing, treating, harvesting, transport, storage, processing, packing and any other operations that may affect the non-GMO integrity of the product.
4.2 Method of segregation	
4.2.1 Segregation shall be achieved by one of the following methods: • The use of dedicated sites, facilities, equipment, conveyances, handling equipment and/or related infrastructure. • By inspecting and/or cleaning and/or flushing facilities, equipment and conveyances between use in contact with	In operations where product movement is achieved by the use of pipework, valves, conveyors, augers, or similar means, precautions must be in place to prevent co-mingling of non-GMO material and other material. These precautions may take the form of either mechanical and/or electrical interlocks or procedures that specify the physical precautions to be taken to prevent co-mingling.

genetically modified or commodity material and non-GMO material. This process must be specified as the result of the risk assessment detailed in Section 1 of this Standard. • A combination of the above methods.	
4.2.2 All facilities and equipment shall be designed to avoid cross-contamination of the non-GMO material from other sources. All facilities and equipment shall be designed to minimise or eliminate areas where materials can be trapped, contributing to later contamination.	
4.3 Identification	
4.3.1 All facilities and conveyances shall be physically labelled or identified in a manner that distinguishes facilities and conveyances containing Cert ID products from other products.	If an operation is wholly dedicated to non-GMO production and handling, such labelling may not be necessary. Identification may be by reference to a plan, IP based system or other means.
4.3.2 Cert ID-compliant inputs, work in progress and finished products shall be stored in designated containers or areas in order to prevent cross-contamination and suitably labelled to enable them to be identified and to facilitate traceability.	
4.4 Product changeover, cleaning & flushing	
4.4.1 Dust and residues that could harbour GMO contamination shall be minimised in the general environment of the facilities and equipment used for production of Cert ID certified products.	Examples are storage bins, silos, transfer equipment, pipework, overheads, processing rooms, warehouses, etc.
4.4.2 The **inspection and cleaning of all equipment and facilities** used to produce and handle Cert ID compliant goods shall be done as necessary to comply with this Standard, and documented including signature of the responsible person.	This requirement applies to equipment and facilities at any stage of production and handling, including farm equipment, storage, transport, conveyances, processing, and packaging. It applies to both routine cleaning as required by 4.4.1 above and where cleaning is a component of product changeover.
4.4.3 Records must specify the cleaning method used and the name of the person who carried out the cleaning.	

4.4.4 In the case of flushing the record must include the amount of material used for the flushing process and details of its subsequent disposition.	
4.4.5 A designated person shall review this changeover process to ensure that all the required steps have been taken. A record of this review shall be kept.	
4.4.6 Where flushing takes place the resulting flushed product shall be segregated and never sold or represented as non-GMO product.	
4.4.7 Sampling and testing shall be carried out on a risk-assessed basis to validate the effectiveness of the cleaning or flushing process.	
4.5 Transport	
4.5.1 Where product is moved to, from, or between agricultural production, storage units or processing units precautions must be in place to prevent co-mingling of non-GMO material and other material.	These requirements apply to any movements within any given operation or between two distinct operations, at any stage of the production chain.
4.5.2 Conveyances used to transport Cert ID compliant material, shall be inspected before loading to verify freedom from potentially contaminated residues and if residues are observed, the conveyance shall be cleaned before loading Cert ID compliant materials. Inspection and cleaning shall be documented.	Conveyance inspection and cleaning forms must be available and used by personnel responsible for overseeing the loading of conveyances. Regard must be had to industry schemes relevant to that sector. For example: in some industry sectors such as feed there are requirements to demonstrate that a defined number of previous loads carried were compatible with the material feed material being carried. Although normally this is intended to prevent taint and foreign bodies, such requirements can also usefully be extended to include GMO or commodity material which is incompatible with Cert ID certified material.

4.5.3 Where Cert ID compliant material is transported as a part-load together with other material, systems and procedures must be in place to specify how the loading, transport and discharge operations are managed to avoid cross-contamination and delivery errors.	Part loads should be avoided where possible due to the added risk of cross-contamination. Where this is unavoidable, systems and procedures must specify the operating systems in sufficient detail to show that segregation is effectively managed at all stages. The detail of these procedures should be arrived at through the risk assessment in Section 1 of this Standard.
4.5.3.1 Cert ID compliant material transported as a part-load together with other material must be clearly identified and segregated to prevent mixing during loading, transport and unloading and to prevent errors in selection of the correct Cert ID-compliant product on delivery to the Customer. The physical means of segregation must effectively prevent cross-contamination by non-compliant material.	When part loads such as split holds on a vessel are being loaded, transported or discharged suitable precautions must be taken to ensure that no co-mingling takes place to cross-contaminate the Cert ID certified material. The operating method used must ensure that the physical barrier between split loads is not displaced during the loading or discharge process.

5.0 TRACEABILITY	
5.1 A system must be in place to ensure that **traceability** can be demonstrated both backwards and forwards from inputs through work in progress to finished product delivered to the customer. This system must operate through all stages of agriculture, production, transportation, storage, handling, processing, and manufacturing. Traceability must link the specific lots of inputs used to specific lots finished product.	
5.2 Records must be kept to relate each batch or lot of crop or product to the storage, handling, processing, or transportation unit used.	
5.3 A running total mass balance shall be maintained for inputs and outputs to permit correlation of the amounts of certified inputs with amounts of certified outputs.	The company must be able to demonstrate the expected loss in processing to explain how the input and output figures relate to each other.

5.3.1 The use of rework in the production of Cert ID certified products must be recorded in the product mass balance.	
5.4 Where batches of Cert ID-compliant products are blended with other batches of compliant products, records must identify constituent batches and their proportions by **lot number** of the original products, and a new lot number must be assigned for the composite lot.	Blending of batches or lots of Cert ID compliant products with batches or lots that are not verified as compliant will usually render the entire combined lot noncompliant unless testing of the previously non-certified lot demonstrates compliance with the Standard.
5.5 Processing **production batch records** must include production date, lot numbers, amount and type of ingredients and inputs used, amount of new product yield (documenting product loss during processing) and a new lot number of the finished product.	
5.6 Customer service, **inventory management**, and order fulfilment procedures must be in operation verifying that the correct Cert ID-compliant product has been selected and shipped to Customers ordering Cert ID-compliant products.	
5.7 Records, including lot codes, must be maintained to demonstrate traceability.	
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, back to the field(s) of origin.	Examples are bulk tanks of liquids, ocean-going containers of loose goods, ship holds, etc.

6.0 SAMPLING and TESTING	
6.1 Sampling and testing shall be used as a key tool in verifying the compliance of Cert ID certified products.	Testing is the means by which corroborative proof of non-GMO status in accordance with the Standard is demonstrated. The need for testing will vary according to the risk of GMO contamination posed by the material itself and the environment in which it is grown and handled. Testing must be carried out in all cases. Where the geographical location is claimed to be non-GMO, testing must still be carried out. The Standard recognises the use of both laboratory based PCR (polymerase chain reaction) tests as well as rapid methods such as strip tests. Each will be chosen according to the need. For example, strip tests enable a rapid result to be achieved so that incoming loads of material can be assessed on arrival at a processing plant. This is a useful means of ensuring that a contaminated vehicle load does not contaminate a whole silo. It is recommended that the test strip is electronically scanned in addition to being retained as the result has been known to change in storage. Rapid test should be regarded as screening and not as definitive evidential tests as it is difficult to subsequently prove the results in a court of law.
6.2 A **sampling plan** shall be established to define the method and frequency of testing.	The sampling plan must be designed on the basis of risk assessment of the type of material, its origin, and the risk of contamination within the production/storage/handling system or general environment as well as industry and regulatory standards. In some industries there are established codes of

	practice covering the taking of samples. International standards are also available in some cases. They may provide further guidance on subjects such as the selection of samples. In all cases Cert ID will evaluate and decide if the sampling plan meets the Cert ID Standard and its objectives.
6.2.1 The sampling plan must be designed to ensure that the sampling is appropriate for the material and statistically valid.	Sampling must be statistically valid. Consideration needs to be given to the probability of detection of GMO contamination. Factors that must be borne in mind include: • sampling frequency • sample size • dilution effect of composite samples It is for the company to be able to demonstrate to Cert ID that their chosen sampling programme is statistically valid. In addition to sample size, the procedure for taking the sample must assure that the resultant sample is representative of the lot of material from which it is derived. It is thus necessary to consider the size of the consignment, how it is stored, etc. For instance, taking a single bucket full of soy from the top of a 500 MT silo does not assure representativeness. Rather, sampling product as it is being filled into the 500 MT silo would provide a more representative sample of the silo.

6.2.3 The sampling method must be designed to ensure that sample collection does not itself cross-contaminate either the product or the sample.	The method of sampling must ensure that there is no possibility of contaminating the sample. This can happen if the sampling equipment is not effectively cleaned before use.
6.3 Testing methods shall be appropriate to the point in the production/storage/handling/general environment under consideration and designed to reliably quantify to the 0.1% threshold.	Testing methods must detect all GMOs that might be present in the material under consideration. Testing methods must be suitable to quantify all relevant GMOs at the 0.1% threshold.
6.3.1 PCR testing shall be used when definitive analytical results are required, and when use of an off-site laboratory is acceptable, and when speed of analysis is not critical.	
6.3.2 Immunologically-based screening-testing using strip tests may be used when rapid testing is essential and when accuracy, sensitivity, and risk of false negatives are not major concerns.	A strict training programme must be in place to assure that personnel correctly conduct and interpret on-site screening tests. For screening methods used at receipt of trucks, in order for a sample to provide reliable information regarding compliance at the 0.1% threshold, sample size must be large enough to assure 95% confidence that GMO would have been detected if it were present at levels of 0.1% or greater. For instance, according to standard statistical calculations, a sample of 1000 beans would not be sufficient, because such a sample has only a 67% probability of containing a single GM soybean, while a sample of 3000 beans would be suitable, because it will have a 95% probability of containing at least one GM soybean.
6.3.3 Genetic (PCR) testing shall be conducted according to a Cert ID-approved method, consistent in its performance with the objectives of the Cert ID certification programme.	Laboratories used must be ISO/IEC17025 accredited and have a history of successful performance in relevant public ring trials.

	For consistency in the Cert ID Non-GMO Certification Program, it is essential that GMO testing be carried out in a highly consistent manner and that analysis of testing data be conducted in an equally uniform and consistent manner. The testing methods and SOPs thus selected for this purpose are those that have been established by the Global Laboratory Alliance (GLA). This approach ensures the rigor and consistency of PCR testing methods and results. Laboratories that are GLA members thus automatically meet the Standard here. Laboratories that are not GLA members must either join the GLA, or license relevant SOP's from the GLA to satisfy this requirement of conducting PCR testing to a Cert ID-approved method.
6.4 Reference samples shall be retained of raw materials and/or finished products. Archived samples must be retained for at least 12 months beyond the time frame during which the product would normally be expected to remain in the food chain.	

7.0 LABELLING and RELATED CLAIMS	
7.1 The organisation shall claim Cert ID Non-GMO certified status only for facilities or products for which Cert ID Non-GMO certified status has been awarded.	
7.2 The organisation shall not use the Cert ID seal, device or motif in a manner that may mislead as to the Cert ID certified status of a facility or product.	The client shall make claims and shall use the Cert ID® seal only in a manner consistent with the actual scope of their certification and shall use the CERT ID® name and seal only to identify products and programmes that have been certified by Cert ID to be in conformance with the Cert ID Standard.

	Cert ID reserves the right to require additional explanatory statements be used on marketing materials in association with the seal to make this clear. Such marketing materials include but are not limited to websites, brochures, displays, etc., and will be considered by Cert ID on a case-by-case basis.
7.3 All uses of the Cert ID seal, logo or other designations shall be approved in writing by Cert ID prior to using them in the market. This requirement applies to all documents, brochures, advertising materials, product labels, and other marketing information.	Clients must submit all such materials to Cert ID for approval before use.

8.0 ADDITIONAL REQUIREMENTS FOR AGRICULTURAL OPERATIONS	
8.1 Controls must be in place to ensure that growers of primary agricultural products meet certain basic principles for non-GMO production as set out below. These controls shall be effected by means of: • a contract between the procurer and the grower(s) which requires compliance with these principles, or, • by audits of growers conducted by or on behalf of the procurer, or, • tests of produce verifying compliance with the Cert ID rejection threshold of 0.1%. • a combination of these methods.	In all cases, admittance of agricultural materials to Cert ID certified status will require testing by an approved laboratory verifying compliance to the 0.1% threshold. Testing shall normally be done at the time the Cert ID certified operation receives the agricultural material, or before they enter that material into their production system.

8.2 Seed used for Cert ID Non-GMO production and produced in Cert ID-compliant production programmes shall not be genetically modified varieties. Seeds shall be verified to be compliant with the specifications of the Cert ID Non-GMO Certification programme, based on genetic testing and traceability documentation.	Seed must contain less than 0.1% GM contamination. However, it is strongly recommended that contamination be held to the lowest possible levels; ideally well below 0.03% to assure that resultant product will be compliant with the 0.1% threshold.
8.2.1 Receipts of seed purchases and labels from seed bags shall be retained along with analytical reports of tests verifying Cert ID compliance of the seed. Records must include supplier's name, date of purchase, variety and/or brand name, quantity and lot number.	
8.2.2 Seed used in the production of Cert ID Non-GMO certified crops shall be traceable to the seed producer.	
8.3 Effective means of **segregation in the field** must be in place between non-GMO and GMO crops.	
8.3.1 A **record of land use** shall be maintained for fields used for Cert ID-compliant crop production. A field-use map shall be prepared for each production year specifying the fields in which each Cert ID-compliant crop is produced, and identifying the uses during that growing season of all neighbouring fields, including genetic status of the crop, within the relevant isolation distance. Field records shall include type and variety of crop grown, lot number of seed used, and dates of planting and harvesting.	
8.3.2 Steps must be taken to prevent previously planted GMO crops from germinating and contaminating fields intended for production of Cert ID Non-GMO certified crops. Such measures shall be a part of a written plan created by the operation.	

8.3.3 Land used for production of Cert ID Non-GMO certified crops shall not have been used for production of genetically modified varieties of the same crop for a risk-assessed period of time.	In most cases this period shall be one year. In the case of crops that have long dormancy periods, such as canola, longer periods will be required. The certified organization should propose a period and provide evidence justifying that period for Cert ID to evaluate.
8.3.4 Controls must be in place to minimise the likelihood that wild plants that can cross-pollinate with GMO crops could function as reservoirs of GM germplasm that could contaminate non-GMO crops by cross-pollination.	
8.3.5 Harvest records shall include crop weight, yield, identity of the field from which the crop was harvested, lot number assigned to the harvest, harvest date, and owner's name.	
8.4 Planting, cultivation, harvesting, storage, and transportation **equipment and facilities** must either be dedicated to Cert ID-compliant crop production or shall undergo inspection and, if necessary, cleaning and/or flushing before use with Cert ID-compliant crops. Inspection and cleaning shall be documented.	
8.5 Storage records shall be maintained which include crop type, volume, and date and location of storage, lot number of the harvest, volume removed for sale and date of removal, invoice or bill of lading for each sale, date of sale, and remaining amount in storage.	

9.0 ADDITIONAL REQUIREMENTS FOR LIVESTOCK AND ANIMAL PRODUCT OPERATIONS	These requirements apply to flesh, milk, eggs and other by-products from animals including fish, fed a Cert ID certified non-GMO diet.
9.1 Use of GMO varieties of animals is prohibited for Cert ID approved livestock or livestock products.	
9.2 Use of **cloned animals** is prohibited for Cert ID approved livestock or livestock products.	
9.3 Livestock used for the production of relevant products under this section shall be segregated from livestock fed a non-specific diet throughout their lifespan. The means of **segregation** shall be effective and, where appropriate, livestock shall be suitably identified to facilitate segregation.	Identification may be accomplished through informational methods such as the use of ear tags, leg bands, or radio frequency ID tags or through other physical means.
9.3.1 Livestock used as slaughter stock (i.e., for meat) must be raised in accordance with this Cert ID Standard beginning at: • the time of breeding for mammals • the day of hatching for birds.	
9.3.2 Livestock raised for dairy, eggs, or wool must be raised in accordance with this Cert ID Standard beginning at: • 12 months prior to the first certified products coming to market, for mammalian products • the day of hatching for eggs	
9.4 All bulk **feed** materials must be verified compliant with the Cert ID Standard according to Section 4 (and particularly Section 4.4 of this Standard).	
9.5 Grazing animals must be prevented from feeding on GM crops.	
9.6 Livestock raised under this Standard shall not have received any GMO vaccines, medications, feed supplements, or hormone treatments (such as rBGH).	
9.7 Livestock products under this section shall be traceable back through all phases of production to place of origin.	

Certification Protocol

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

The Cert ID Application

When the company feels that it is ready for certification it should complete the application form and return it to Cert ID. The application form requests information on the scope of the activities of the organization and other key information. This information is used to define the scope of the certification programme.

Service Specification

A service specification will be written setting out the programme plan, fee structure and payment terms. The organisation should sign this document, agreeing to the terms and conditions and return it to Cert ID.

Cert ID Fees

Details of fees are provided with the certification plan/agreement. The payment for services is required in advance of the service being undertaken, or as agreed by Cert ID. Fees are dependent on the nature of the individual Client's programme and will be quoted in an individual service specification.

Further fees may be applicable in the event of a challenge where Cert ID may be called upon by a certified organization to provide professional support in addition to information available on the database. Such fees will be discussed with the organization prior to undertaking the task.

Appointment of Auditor

Cert ID will appoint and schedule an auditor to perform the on-site audit as set out in the service specification.

Audit

The audit will include:

- Opening meeting to confirm the arrangements
- Systems and documentation audit
- Site audit to observe the facilities and operational practices
- Closing meeting to present the overall findings of the audit. The auditor will leave list of findings with the organisation. This enables the organisation to start work on its corrective actions without delay.

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
- detailed audit findings for all of the aspects observed during the audit

The organisation 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, procedures etc Cert ID may conduct a further onsite visit to verify corrective actions.

Certification

After satisfactory closeout of non-conformances within the appropriate timescales the report, corrective actions and other relevant circumstances will be reviewed. A certification decision will be made by personnel who are independent of the audit process. If the decision is that certification is confirmed a certificate will be issued to the organisation.

Maintenance of Certification

Cert ID will contact the organisation before the expiry of its current certification to arrange a surveillance audit in sufficient time to maintain its certified status. If the organisation cannot agree on an audit within the appropriate timescale, certification will be terminated. Once certification is terminated the use of the Cert ID certification programme seal must cease

and no claims related to the Cert ID status of product may be made. It is the responsibility of the organisation to maintain certification.

In order to assist with the planning of surveillance audits at a mutually convenient time the audit can take place up to 42 days before and 42 days after the re-evaluation due date. The due date remains as the anniversary of the date of the original non-GMO certification audit.

Surveillance Audits

Surveillance audits will cover the full scope of the Standard. The organisation will therefore be assessed against all clauses of the Standard.

Responsibilities and Rights of Certified Organizations

The responsibilities required of certified organizations are summarized as follows:

- to demonstrate that the requirements of the Standard are met on a continuing basis.
- to co-operate with Cert ID, approved audit bodies, and testing laboratories as appropriate.
- to claim certified status only for the scope and period of time awarded.
- to adhere to the guidelines on the use of the CERT ID® Seal and any associated product certification claims.
- to make appropriate payments to Cert ID for certification services rendered.

Suspension of Certification

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

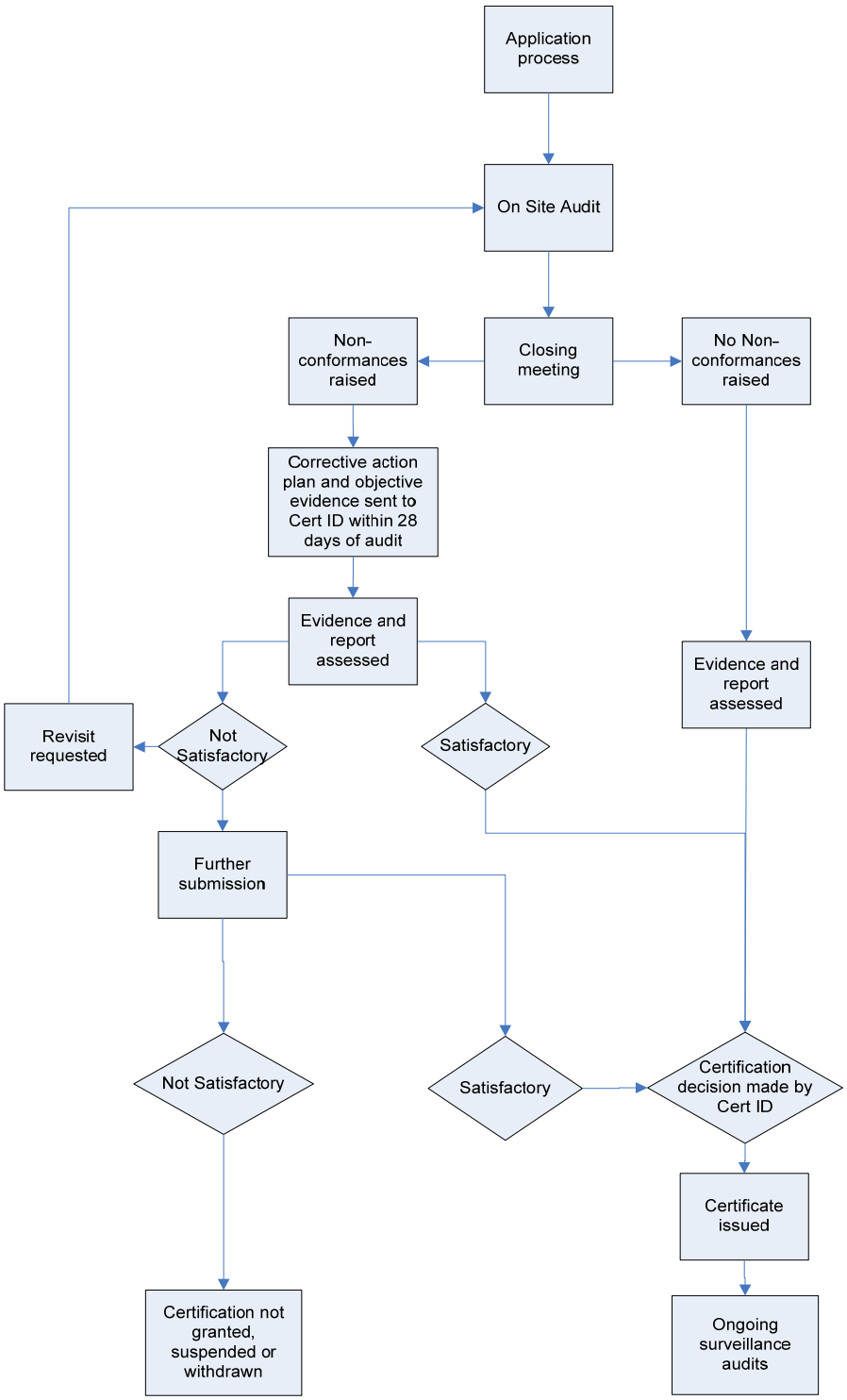
Complaints

Organisations have the right to make complaints about the certification programme, audit or testing bodies. Complaints should be submitted in writing, detailing the nature of the complaint, the personnel involved, any relevant dates, and giving relevant reference codes. Complaints should be submitted to the Certification Programme Manager or Director, as appropriate.

Appeals

Should an organisation disagree with the decision on certification, it has the right to appeal. Appeals should be submitted in writing, stating the decision made by Cert ID and the reasons for disagreement. Appeals should be submitted to the Chief Certification Officer, who will gather evidence about the disputed matter and report to the appeals committee who will adjudicate. The decision of the committee will be final. In circumstances of suspension, withdrawal, complaint, or appeal, the organisations will be informed in writing of the action taken / decisions made. Cert ID will not reimburse any fees incurred.

Cert ID Non GMO Standard - Certification Process Flow



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	Jun 9 1999	None	v2.02-02
	Dec 20 1999	None	v2.05
	February 15 2000	None	v3.00
	Oct 1 2001	None	v3.02
	Nov 13 2002	None	v3.02.2
CERT ID Non-GMO Certification Program	March 2004	None	v4.0
CERT ID Non-GMO Certification Programme	Sept 22 2008	None	v5.0
	Oct 1 2008	Corrected typo in section 3.4.3	
	Nov 14, 2008	Amended section 3.5.2	V5.1