



Donau Soja Standard

The Donau Soja programme has been established to promote and propagate the cultivation, processing and marketing of GM-free, origin-controlled **quality soya from the Danube Region**. Our aim is to develop and guarantee a GM-free protein supply in Europe.

Donau Soja is a product of controlled origin and quality. It has two essential characteristics: The soya originates from the Danube Region (European **origin**), and the soya beans and the products derived from them are **GM-free**. Food produced from or using Donau Soja soya beans may be labelled as "Donau Soja" or "fed with Donau Soja". Use of the **registered brand** is subject to signing a Licence Contract as well as compliance with the Donau Soja and Europe Soya Agreement for Logo Use¹.

Partners located in non-EU member states shall comply with the current legal provisions of EU law², particularly those concerning the use of pesticides in soya bean cultivation and the processing of raw soya beans along the processing chain. Furthermore, both EU-wide and international regulations on labour and social rights² (ILO conventions) shall apply. Donau Soja soya bean farmers shall therefore undertake in writing to comply with these requirements.

Donau Soja certified produce automatically meet the criteria required for **Europe Soya** certification (see website www.donausoja.org for the Europe Soya Standard and criteria).

1 Definition of "Danube Region"

The countries and regions of origin for Donau Soja are defined in both political and geographical terms.

Enumeration of the countries in which Donau Soja can be produced is based on the list of countries in the Danube river basin as delineated by the International Commission for the Protection of the Danube River (www.icpdr.org/main/danube-basin/countries-danube-river-basin). The geographical definition of potential cultivation areas in each country is based on consumer expectations related to the term Donau Soja on the one hand, and on the feasibility of monitoring the origin of products on a region-by-region basis on the other hand. The geographical regions detailed on the Donau Soja Map (= Donau Soja cultivation areas) constitute a permanent feature of the Donau Soja Standard.

2 Definition of "GM-free"

Donau Soja soya is derived from GM-free cultivation using GM-free soya bean varieties either listed in the EU common catalogue of plant varieties or in the respective national catalogue of plant varieties. Farmers producing Donau Soja are not allowed to grow any other GM crop either. Animal feed with the quality label "Donau Soja" shall be approved for use with

¹ Reference for the Donau Soja and Europe Soya Agreement for Logo Use: www.donausoja.org/en/downloads

² All relevant EU directives und EU regulations as well as the individual ILO conventions are listed in the **Annex** to the Donau Soja Guidelines.



livestock, the products of which can subsequently be marketed with the quality label "Ohne Gentechnik hergestellt"/"Produced without GMOs".

GM-free labelling under the Donau Soja programme shall be based on the production, inspection and labelling guidelines as established by the Austrian ARGE Gentechnik-frei (Platform for GMO-Free Food Products, en.gentechnikfrei.at). Hence, the underlying legal provision regulating the GM-free status shall be the *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of "GMO-Free Production" of Food and its Labelling) published in the Austrian Food Codex (Codex Alimentarius Austriacus)³ in combination with its *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production)⁴. Products that fulfil the requirements of the German *Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*⁵ may, with respect to the criterion of being GM-free, also be labelled as "Donau Soja" provided that they are monitored by an independent certification body, as stipulated by the German Verband Lebensmittel ohne Gentechnik (VLOG, www.ohnegentechnik.org).

Apart from the possibility of providing non-GM certifications in accordance with the Austrian Food Codex or the German VLOG, the GM-free status can also be verified, within the scope of Donau Soja inspections and certifications, by inspections conducted in compliance with the requirements and the Inspection Standard of the "Non-GM Danube Region Standard"⁶ published in 2016.

3 Plant protection

The relevant legal provisions of EU law shall apply. Furthermore, the use of desiccants prior to harvest (e.g. glyphosate or diquat) shall be prohibited. The "Best Practice Manual"⁷, which was published by the Donau Soja Organisation and is continuously updated, shall be considered a non-binding recommendation for improving the profitability of soya bean production while, at the same time, reducing the use of plant protection products.

³ Reference for the *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of GMO-Free Production of Food and its Labelling) in the Austrian Food Codex, IV edition: www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn

⁴ Reference for the *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production): www.bmwfw.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf

⁵ Reference for the *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: www.gesetze-im-internet.de/eggentdurchfg/BJNR124410004.html

⁶ Reference for the Non-GM Danube Region Standard and Inspection Standard: www.donausoja.org/en/downloads

⁷ An updated version of the Best Practice Manual is available at the Donau Soja website: www.donausoja.org/en/downloads



4 Nature reserves and change of land use

Donau Soja soya shall not be grown in national and international nature reserves where the production of crops is not allowed. The term "nature reserves" covers all different categories of protected areas for nature and landscape protection, including but not limited to national parks, landscape protection areas, Natura 2000 sites, Ramsar wetlands, UNESCO World Heritage Sites, natural parks, biosphere reserves. No new agricultural land shall be developed for Donau Soja soya production if this would result in the loss of nature reserves, natural forests, riparian vegetation, wetlands, moors, floodplains or steep slopes.⁸ Donau Soja soya bean farmers shall therefore undertake in writing to only use land (for the cultivation of Donau Soja soya) that was dedicated to agricultural use no later than 1 January 2008.

5 Additional requirements for farmers

Donau Soja soya bean farmers shall participate in the implementation of the CAP (Common Agricultural Policy)⁹ with mandatory *cross compliance* inspections. Alternatively, the farmer shall participate in an ISCC certification programme¹⁰ or an equivalent sustainability certification programme¹¹.

Inspections:

Compliance with the Donau Soja Standard shall be verified against the detailed requirements specified in the Donau Soja Guidelines by an independent external certification body accredited in accordance with the ISO/IEC 17065:2012 standard. Furthermore, Donau Soja Organisation shall commission risk-based supervisory inspections.

If there is reason to suspect that any provision has not been complied with, special inspections shall be conducted. Any breach of the Guidelines will result in remedial measures including the payment of penalty fees, up to and including the exclusion from the Donau Soja programme.

⁸ If any alteration of protected areas has taken place, the farmer shall be obliged to restore the affected areas to their former state.

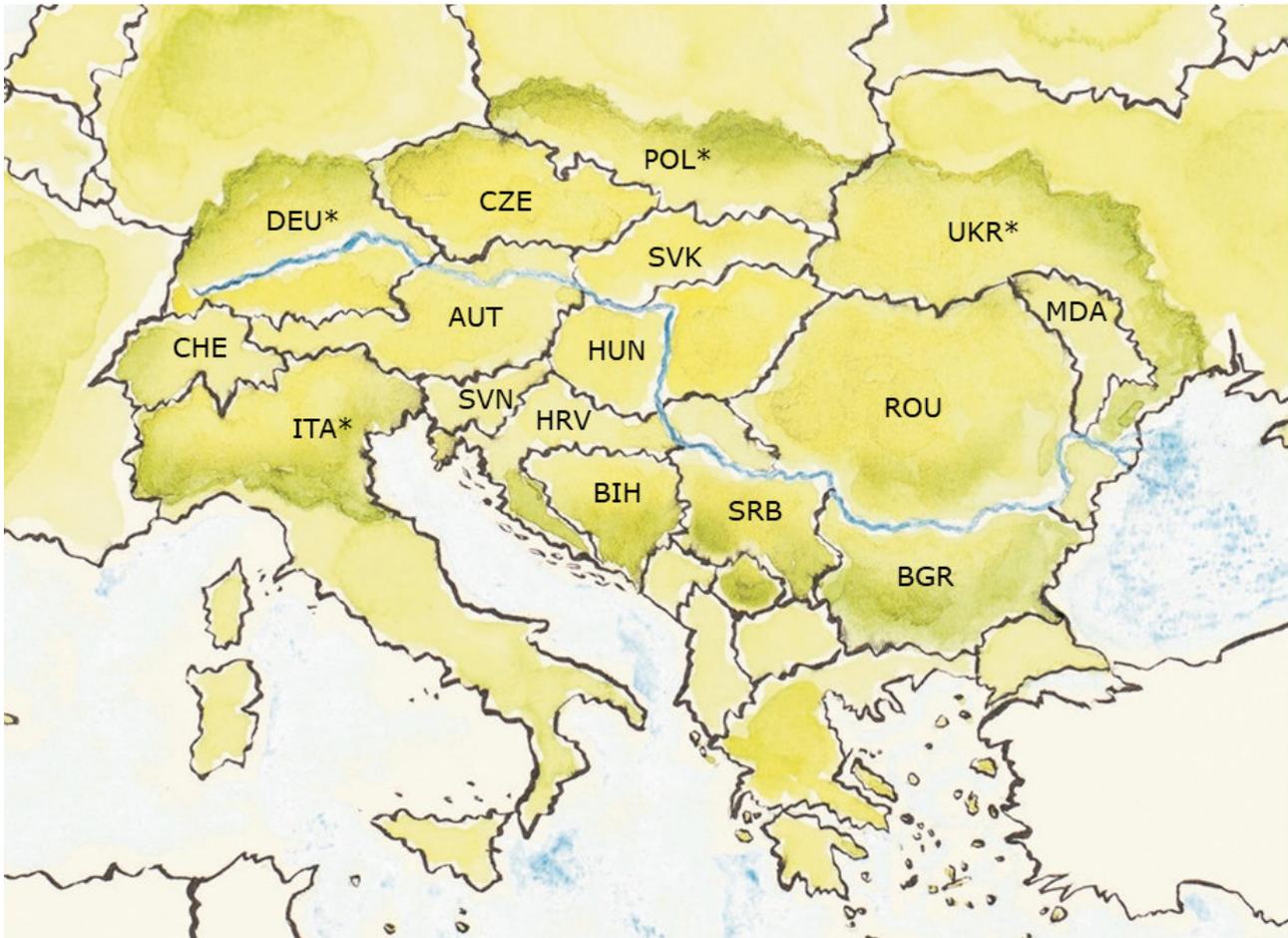
⁹ For relevant EU directives and EU regulations, refer to http://ec.europa.eu/agriculture/envir/cross-compliance_en

¹⁰ Refer to www.iscc-system.org for ISCC EU or ISCC Plus

¹¹ An equivalent standard shall at least comply with the FEFAC sustainability criteria (available at: www.fefac.eu/files/62592.pdf) and can be approved as such by the Donau Soja Board upon request.

Geographical map showing the Donau Soja cultivation areas

Donau Soja Map



* These countries are included with the following regions:

GERMANY: Bavaria, Baden-Württemberg

ITALY: Trentino Alto Adige, Friuli Venezia Giulia, Veneto, Emilia-Romagna, Lombardia, Piemont, Vallée d'Aoste

POLAND: Dolnoslaskie, Opolskie, Slaskie, Swietokrzyskie, Podkarpackie, Malopolske

UKRAINE: Uschgorod, Tschernowzy, Winniza, Odessa, Lwow, Ternopol, Chmelniczkiy, Iwano-Frankovsk



Core Principles of Inspection (Overview)

Donau Soja is a product of controlled quality and origin. The detailed requirements specified in the Donau Soja Guidelines particularly provide the details for complete monitoring of the origin of the produce and for implementing a GM-free status along the entire processing chain.

As a rule, the relevant legal provisions of EU law shall apply for the production, treatment and processing of Donau Soja. The GM-free status is based on the minimum requirements set by the Austrian Food Codex (Codex Alimentarius Austriacus) and the corresponding *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production)¹². Compliance with the requirements of the German *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*¹³ with inspections performed in accordance with the German VLOG, as well as compliance with the Non-GM Danube Region Standard¹⁴ shall be deemed to be equivalent. Further requirements for compliance with the criterion of being GM-free can be recognised as being equivalent by the Donau Soja Association. In any case, animal feed shall be of a quality "geeignet zur Herstellung gentechnikfreier Lebensmittel" (suitable for use in non-GM food production).

For reasons of general quality assurance, all oil mills and compound feed producers shall be obliged to participate in a QA programme recognised by the Donau Soja Organisation. A list of recognised programmes and standards can be found in the detailed requirements R 04 (Soya Bean Primary Processor) and R 05 (Compound Feed Producer).

The Donau Soja inspection system is comprised of three stages:

- quality assurance and inspection systems operated by the participants in the Donau Soja system;
- external inspections and certifications commissioned by the licensees; these shall be conducted by ISO/IEC 17065:2012-accredited certification bodies approved by Donau Soja Organisation;
- supervisory inspections, in collaboration with an inspection body or inspectors, directly commissioned by Donau Soja Organisation; supervisory inspections shall be risk-based, in the order of 10 % of the licensed quantity of Donau Soja soya.

¹² Reference for the *Richtlinie zur Definition der "Gentechnikfreien Produktion" von Lebensmitteln und deren Kennzeichnung* (Guideline on the Definition of GMO-Free Production of Food and its Labelling) in the Austrian Food Codex, IV edition: www.verbrauchergesundheit.gv.at/lebensmittel/buch/codex/beschluesse/Gentechnikfrei_RL_15_1_2018.pdf?6fdsmn

Reference for the *Leitfaden zur risikobasierten Kontrolle auf Gentechnikfreiheit* (Guideline on the Risk-Based Monitoring of GMO-Free Production): www.bmwf.gv.at/TechnikUndVermessung/Akkreditierung/Documents/Leitfaden%20L25_Risikobasierte%20Kontrolle%20Gentechnikfreiheit_V03_20150304.pdf

¹³ Reference for the *EG-Gentechnik-Durchführungsgesetz (EGGenTDurchfG)*: www.gesetze-im-internet.de/eggendurchfg/BJNR124410004.html

¹⁴ Reference for the Non-GM Danube Region Standard and Inspection Standard: www.donausoja.org/en/downloads



In order to guarantee comprehensive monitoring, all participants in the Donau Soja programme shall be subject to inspections. Confirmation of compliance with the Donau Soja Guidelines as a result of external inspections shall be passed on within the process chain in the form of a certificate. Lot-based issuance of certificates shall additionally take place from the agricultural collector to the primary processor. All participants in the Donau Soja system may be inspected at any time and on a risk basis within the scope of supervisory inspections (risk-based sampling).

Donau Soja farmers shall be registered with the agricultural collector. During this registration, farmers shall undertake to comply with the Donau Soja Guidelines on behalf of their agricultural holdings by signing the Declaration of Self-Commitment – Farmers (Soya Bean Producers)¹⁵, and shall accept risk-based sampling within the scope of supervisory inspections by Donau Soja Organisation.

Primary processors (such as oil mills, toasters, food producers and producers of food ingredients and food additives), processing and/or treating soya beans chemically or physically most substantially, shall conclude a contract with Donau Soja Organisation in which they pledge, among other things, to:

1. know and comply with the Donau Soja Guidelines;
2. conclude, at their own expense, an inspection contract with an external ISO/IEC 17065:2012-accredited certification body approved by Donau Soja Organisation;
3. accept risk-based sampling within the scope of supervisory inspections directly commissioned and paid by Donau Soja Organisation;
4. pay a Donau Soja fee to Donau Soja Organisation (the fee shall only be charged once within a continuous processing chain at the primary processor stage);
5. impose points 1 to 3 on all their suppliers (including their supplier's suppliers) by contract, up to and including the agricultural collector.

This ensures that all participants in the Donau Soja system are aware of the Donau Soya Guidelines, have compliance with these Guidelines verified externally by certification bodies that are approved by the Donau Soja Organisation, and agree to supervisory inspections.

Compound feed producers shall also conclude a contract with Donau Soja Organisation in which they undertake to comply with the above mentioned points 1 to 3.

Marketers intending to place products with the Donau Soja logo on the market, shall undertake not only to comply with the above mentioned points 1 to 3, but also to impose the obligation to comply with the Guidelines, together with the inspection requirements, on their suppliers and their suppliers' suppliers by contract.

The frequencies of both external inspections and supervisory inspections (risk-based sampling), as well as additional requirements for certain participants in the Donau Soja system, are based on the risk of (a) a different origin of the produce or (b) contamination of Donau Soja with GM crops.

¹⁵ For details, see document "Declaration of Self-Commitment – Farmers"



The countries where Donau Soja may originate from are classified at the following four risk levels (RL):

- Risk Level 0 (RL 0):
EU countries: national bans on the cultivation of all GM crops approved for cultivation in the EU (currently GM maize),
non-EU countries: no GM varieties approved for cultivation;
- Risk Level 1 (RL 1):
risk is related to geographical origin (countries represented with regions: DEU, ITA, POL);
- Risk Level 2 (RL 2):
risk of GM contamination with other crops (e.g. maize); concerns countries such as CZE, ROU, SVK – where the cultivation of GM maize is not prohibited and contamination may therefore occur;
- Risk Level 3 (RL 3):
risk of contamination with GM soya because GM soya beans are cultivated in this country or were cultivated there up until two years ago, or because the situation is unclear (e.g. MDA, UKR).

Precise obligations for the different risk levels (RL) at the stage of farmers, traders, agricultural collectors, primary processors, compound feed producers, agricultural processors and marketers, as well as binding inspection frequencies are specified in detailed requirements for all participants in the Donau Soja system.

May 2019



Donau Soja Inspection Frequency

	Risk Level 0 Donau Soja soya only	Risk Level 1 risk of origin	Risk Level 2 GM risk for crops other than soya	Risk Level 3 GM risk for soya
F	no GM cultivation in this country	<i>not relevant</i>	cultivation of other GM crops (e.g. maize) permitted	cultivation of GM soya beans in this country
C	no (1)	no (1)	no (1)	yes; additional: registration of F + original seeds
F				once a year
AC	stores only DS	stores only GM-free crops, but soya beans of different origins (non-GM) are possible	stores only GM-free soya beans, but other GM crops (e.g. maize) are possible	stores other GM crops, but GM soya beans (soya bean meal) are also possible
C	yes	yes	yes	yes
F	every 2 years	every 2 years	every 2 years (Romania: once a year)	once a year
T	soya trade with DS only	soya trade with GM-free soya only	<i>not relevant</i>	both GM and non-GM soya trade
C	yes	yes		yes
F	every 2 years	every 2 years		once a year
PP	only DS processed	other GM-free soya beans processed as well	other GM crops processed as well	GM soya beans processed as well
C	yes	yes	yes	yes
F	once a year	once a year	twice a year (once unannounced)	twice a year (once unannounced)
CFP				
C	yes	yes	yes	yes
F	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)
AP	DS soya single or compound feed only	also other non-GM soya single or compound feed	also GM single or compound feed (but only in another farm activity)	also GM single or compound feed in the same facilities
C	yes	yes	yes	yes
F	every 2 years	every 2 years	every 2 years	once a year
FP				
C	yes	yes	yes	yes
F	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)	according to non-GM inspections (2)

(1) ACs are required to check the plausibility of the details given by Fs. Fs with registration obligation at risk level 3 need to be inspected externally once a year.

(2) Whenever possible, Donau Soja audits shall always be conducted together and in combination with non-GM inspections.

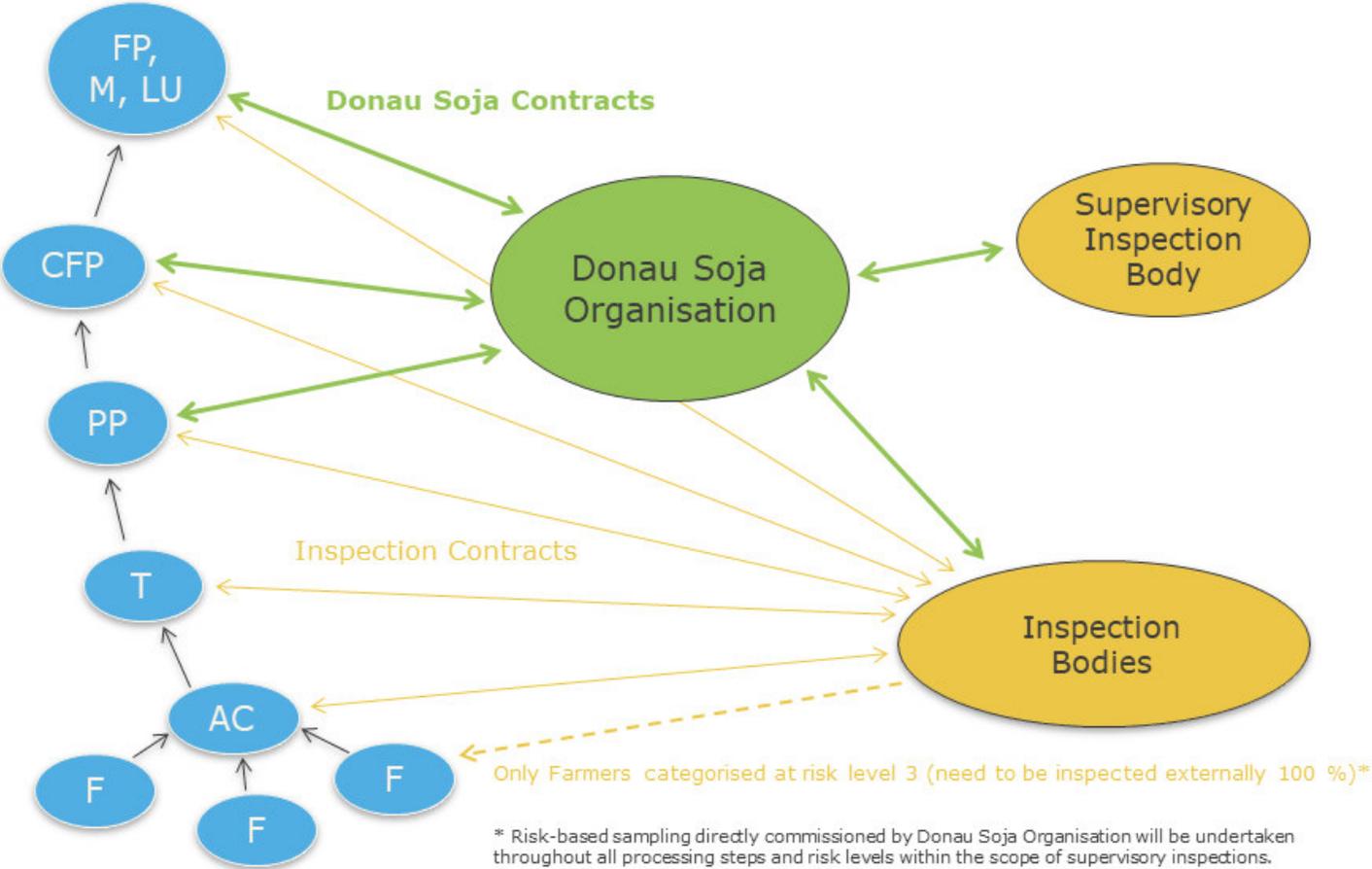
If this is not possible, the Donau Soja audit shall be conducted at least once a year.

DS = Donau Soja; **F** = Farmer, **AC** = Agricultural Collector, **T** = Trader, **PP** = Primary Processor, **CFP** = Compound Feed Producer, **AP** = Agricultural Processor, **FP** = Food Processor
C = Certification, **F** = Frequency; **non-GM** = non-genetically modified, **GM** = genetically modified

Risk-based sampling directly commissioned by Donau Soja Organisation will be undertaken throughout all processing steps and risk levels within the scope of supervisory inspections.



Donau Soja Contract System



* Risk-based sampling directly commissioned by Donau Soja Organisation will be undertaken throughout all processing steps and risk levels within the scope of supervisory inspections.

F = Farmer, AC = Agricultural Collector, T = Trader, PP = Primary Processor, CFP = Compound Feed Producer, FP = Food Processor, M = Marketer, LU = Logo User

Please note: exemplary flow of Donau Soja value chain