\4 December 2018

Draft Minutes Joint Meeting Trade & Production

Program

9.30-12.30 Joint Meeting Trade & Production

Location

Postillion Hotel Arnhem,
Europaweg 25, 6816 SL Arnhem

Contact details

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Present

Ms. Anne Sikkema-Hof, Mr. Diek van Ramshorst, Mr. Martin Alm, Mr. Gerrit van Heerikhuize, Ms. Sabina Schwarz, Mr. Coen van der Geest, Mr. Robin Sanders, Ms. Audrey Rensen-van Lijden, Ms. Beate Dahl, Mr. Jos Kroonen, Ms. Aly Rappange

GMP+ International:

Ms. Els van der Boon, Mr.. Dik Wolters and Mr.. Jaap van der Kloet, Ms. Madhura Rao

No.	Description
1	**Welcome and introduction** Mr.. Jaap van der Kloet opens the meeting and welcomes everybody. The main topics of today's meeting are the Project Redesign and the Project Harmonization of Purchase Requirements. The progress of the different gatekeeper protocols will be discussed. Mr. Jaap van der Kloet acts today as chair of the meeting.
2	**Minutes of previous meetings** Joint meeting (06-12-2017) – SCTP-18-01 The minutes of the previous meeting are discussed. The following remarks are made:

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	• Page 7, Evaluation Salmonella Limits: Ms. Audrey Rensen-van Lijden mentions that she does not agree with the third bullet point that states that everybody agreed to introduce Salmonella limit for feed material which are delivered to compound feed producers in the GMP+ FC scheme. • Ms. Sabina Schwarz asks why unannounced audits were not a part of the day's agenda. Ms. Els van der Boon explains that GMP+ is working on a suitable agreement with QS and a communication about the decision will be sent together by QS and GMP+ International. List of actions SCTP-18-21 The list of actions are approved.
3	**Announcements** No announcements.
4	**Update Project Redesign** Ms. Els van der Boon presents the progress of the Project Redesign and emphasizes that the project will focus on feed safety assurance. ISO 22000 is used as inspiration for the redesign of GMP+ documents, the High Level Structure will be followed and the content will be used as a base. She gives an overview of the developments so far, the Redesign approach, an overview of the structure of the new documents which will be divided in Core Standards, Technical notes, and Guidance documents. The PowerPoint presentation will be send to the members of the subcommittees together with the minutes. There is a constructive discussion about several topics: Members discuss the new scheme will have information about registration with local competent authorities outside the EU. The discussion concludes with the understanding that there is still a gap between EU countries and third countries when it comes to such a registration. Ms. Els van der Boon reminds the members that the project will not delve deeper into legislation but only explain the connection of the scheme to legislation better in order to reduce discussions about the same. Ms. Aly Rappange asks whether only the core documents and specific technical notes will need to be followed in order to be certified. Ms. Els van der Boon confirms that this is the case. She clarifies that the guidance documents are only meant as a support tools.

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	Mr. Jaap van der Kloet announces that the Production, Trade, and Storage working groups still need members and that possible participants are requested to send in their names. Mr. Robin Sanders asks whether members from outside EU are welcome to join. Mr. Jaap van der Kloet confirms that it would be possible and it could be arranged for them to participate via a Skype meeting. Ms. Beate Dahl mentions that she would like to be a part of the Trade group depending on her availability. Ms. Sabina Schwarz asks if GMP+ International will be going in for accreditation for the new scheme and whether it would be for product or process accreditation. Ms. Els van der Boon confirms that the new scheme will be accredited and Mr. Dik Wolters explains that it will be accredited as a system certification scheme. Furthermore Els van der Boon explains that also the other members of the GMP+ community (outside the committee members) will be informed and involved in the project redesign. A communication and involvement program has been developed. This year the first communication will start, also a webpage with general information about redesign will be developed, FAQ lists etc. <u>Conclusion and actions</u> GMP+ International will continue with Project redesign as intended and will welcome members to join various working group. The members are asked to send an email to GMP+ International (action 18.1). If members from outside the Netherlands and Germany wish to join, GMP+ International will arrange for them to be present. PowerPoint presentation will be shared with members.
5	**Harmonization purchase: progress** Mr. Dik Wolters presents information regarding updates on the harmonization efforts undertaken by GMP+ International for purchase standards. His presentation focuses on gatekeeping of processed feed materials, where there is the intention to introduce 2 new protocols: one for incidental purchase of processed feed materials and one for purchase of processed feed materials on a regular base. The main difference between these 2 types of processed feed materials is that the protocol for 'incidental' purchase does not aim for a completely certified chain whether the gatekeeper protocol for regular feed materials does. This results for instance in a difference in time period the gatekeeper can use the protocols. 'Incidental' is maybe not the right name for this protocol as also, under conditions, regular purchase of specific feed materials (including small quantities) should be covered under this protocol.

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	The idea is that the protocol for purchasing feed materials on a regular base cannot be used in 6 countries where already for a long time a feed safety scheme is being operated. In the future other countries can be added to this list. Mr. Jos Kroonen asks why there was a separate classification for incidental protocol. Ms. Sabina Schwarz gave as an answer an example of an incident involving financial losses for the purchase of spelt that was not certified as safe feed and how using an incidental purchase protocol could have prevented the loss. Ms. Beate Dahl asks if there was the possibility of introducing a definite number for the 'small quantity' which was permitted to be purchased under the incidental protocol. Mr. Dik Wolters responds that this is still to be decided. Another suggestions is to develop definitions for incidental purchase, small quantities, special application, feed trials. Ms. Sabina Schwarz asks if the three year time frame for using the gatekeeper protocol can be replaced by another parameter such as quantity or number of purchases. Mr. Dik Wolters explains that it is possible to consider if and how this can be integrated in a harmonized approach. Mr. Jos Kroonen reminds the members that the gatekeeper protocol should not be misused in order to avoid getting certified. In response to this, Mr. Diek van Ramshorst emphasises that not all companies that supply to the feed industry are focused on feed. He reminds the members that the Gatekeeper protocol is an important aspect of purchasing from the food or pharma industry. Mr. Jos Kroonen responds that it is important to have strong standards in place even while purchasing from food or pharma companies to ensure the safety of the feed supply chain. Mr. Dik Wolters asks members if a gatekeeper should be allowed to derogate from monitoring requirements. Mr. Jos Kroonen responds that he should be allowed to derogate based on his previous track record. Ms. Sabina Schwarz advices to group products together to avoid large checklists. Mr. Dik Wolters explains that it is up to the auditor to assess whether the gatekeeper and incidental protocols are correctly used. Ms. Sabina Schwarz advises that GMP+ International should consult with Certification bodies and check if they have the knowledge to assess this. Ms. Audrey Rensen-van Lijden advises that Certification Bodies should charge an extra cost for assessing whether a company can use the gatekeeper protocol. Ms. Anne Sikkema-Hof advises that this should be based on whether the auditors need check only the protocol or also the risk assessment.

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	Ms. Sabine Schwarz enquires about the possibility to have a direct contract with GMP+ International regarding the use of data. From a legal point of view, this would enable companies to share more information about using the gatekeeping or incidental purchase protocol. Safety and privacy of data, rights and duties of the applicant and GMP+ Int. are topics to consider in this contract. QS and efiqs have these contracts. Ms. Els van der Boon responded that it could be a possibility to look into this Conclusion • Members agree that the incidental purchasing protocol is a positive development. • Members agree that for gatekeeping regular processed feed materials the list of countries where gatekeeping is not allowed (start with 6 countries) is ok. • Everybody agrees that gatekeeping should be closely monitored so that it is not used as a backdoor to avoid getting certified. • Members agree that GMP+ International's risk based approach to gatekeeping regular processed feed materials and incidental purchase is positive for business. • Derogation from 100% monitoring (batch by batch) should be possible based on a risk analysis. Action points GMP+ International will carry out the following actions (action 18.2): • Send members documents from QS about how their gatekeeping protocol works and what information they have from their companies that act as a gatekeeper. • Another suggestions is to develop definitions for incidental purchase, small quantities, special application, feed trials • Discuss with certification bodies what the best way to go about the approval of the gatekeeper protocol and incidental purchase protocol. • Consider the possibility of having direct contracts with companies regarding data usage (privacy of data, rights and duties of the applicant and GMP+ Int. are topics)
6	**Update implementation GMP+ B11 (Registered Labs)** Mr. Jaap van der Kloet announces that the GMP+ B11 and GMP+ BA11 came into effect in March 2018.

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	Ms. Audrey Rensen-van Lijden enquires about how many labs that applied for certification have been certified. Mr. Jaap van der Kloet informs. her that this data has not yet been analyzed and needs to be worked upon. Ms. Audrey Rensen-van Lijden mentions that the pesticide list is dynamic and it is not possible for a laboratory to be registered for the analysis of all pesticides. She expresses her concerns regarding whether this would deter some labs from applying for registration. Mr. Jaap van der Kloet acknowledges that this is indeed an issue. This topic is discussed at an evaluation meeting with certification bodies. He welcomes any suggestions from the members regarding how this situation could be improved. Conclusion GMP+ International will consider suggestions from members regarding pesticide analysis carried out by registered labs.
7	**Next Meetings** • 26th March 2019 Communication regarding this meeting will be sent after an internal discussion (Action 18-01). • 1st October 2019 The date for this meeting is confirmed.
8	**Any other business** No comments are made.
9	**Closing** Mr.. Jaap van der Kloet thanks everybody for their input and closes the meeting at 13.00.