

# BT-04-03

Ver 1.00



## Purchase: Specific purchase protocols – Module 3



## DOCUMENT HISTORY

Revision and approval date	Reason for revision	Revision scope	Ultimate date for application
0.7 26/09/2014	Introduction of a new purchase protocol named "(former) foodstuffs and by-products for reprocessing "	Module 3	01/10/2014
	Module 2 : change of denomination of Canary grass seeds and of the group « Various seeds » (only for the Dutch and English versions)	Module 2, point 1 and table 2	
0.7b 29/09/2014	Introduction of a new purchase protocol named "(former) foodstuffs and by-products for reprocessing "	Module 3	01/10/2014
0.8 21/10/2016	New lay-out	Entire document	21/10/2016
	Modification of the designation (logo and standard)	Entire document	
0.9 03/07/2018	Module 1: modifications in purchase conditions scope	Module 1, point 1	01/10/2018
	Module 1: modification monitoring	Module 1, point 4	
	Module 1: addition communication to customer	Module 1, point 5	
	Module 1: adaptation minimum parameters to be analyzed	Module 1, table 1	
	Module 2: details on the content of the request for the introduction of a new feed material	Module 2, point 1	
	Module 2: addition of 3 new feed materials	Module 2, point 1 and table 2	
	Module 2: adaptation of the check for sorting issues	Module 2, point 1	
	Module 2: warning about the presence of natural alkaloids in horse feed	Module 2, point 1	
	Module 2: clarification on the communication of information to OVOCOM and the certification bodies	Module 2, points 3 and 5	
	Module 2: addition of point of attention 'Salmonella' for sesame seeds	Module 2, tableau 2	
Module 3: modification scopes: witness audits instead of audits by certification bodies, conditions scope by trader	Module 3, point 1.2		
0.10 25/09/2019	Addition of a new module on hay and straw transport	Module 4	16/09/2019
1.0 27/08/2020	Splitting the BT-04 document into BT-04-xx modules	Module 3	27/08/2020

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# BT-04: Purchase: Specific purchase protocols – Module 3

## 1. Application

### 1.1. Application scope

This document may only be applied by FCA certified producers:

- In connection with the purchase of products as shown below; and
- If their supplier does not meet the requirements described in document 'BT-02: Purchase: general provisions' in connection with the purchase of feed materials and/or by-products for reprocessing.

Both the producer (processor) as well as the supplier must comply with the conditions stipulated in this document.

The Protocol in question shall by no means apply to trade in by-products for reprocessing (except for the exception described in table 1.2). The products shall be sold directly by the food company to a FCA certified producer.

#### 1.1.1. Products concerned

The module in question is solely applicable to the purchase of (former) foodstuffs produced by the food company. These could be foodstuffs or by-products for reprocessing. This document stipulates the conditions to which a supplier or buyer of these by-products shall need to comply.

The specific purchase Protocol as regards the module in question shall apply to:

- Foodstuffs (intended for use as feed);
- Former foodstuffs (intended for use as feed);
- By-products for reprocessing.

#### 1.1.2. Definitions

In the context of the module in question, the following definitions shall apply:

##### **Batch or lot:**

See document 'AC-00 – Introduction'.

##### **By-products for reprocessing:**

By-products, derived exclusively from the food sector, but are not compliant with the definition «Feed materials» (cf. Art 3.g) to Regulation (EC) 767/2009, may only be used as «feed materials» after a specific treatment (heat treatment, removal of packaging, etc.) (cf. BC-00).

Note 1: The placing on the market or use, for the purpose of animal nutrition, of packages and parts of packages from the use of products originating from the food business industry is prohibited (cf. Annex III of Regulation. (EC) No 767/2009). Products containing packaging materials or parts of packaging materials must always be considered as 'By-products for reprocessing'.

Note 2: All standards for feed materials, and requirements linked to the transformation and to the transport of feed materials, as mentioned in the documents of the FCA Standard shall apply to 'By-products for reprocessing' (with the exception of criteria justifying the transformation of the by-products).

**Feed materials:**

See document 'AC-00 – Introduction'.

**Former foodstuffs (Commission Regulation (EU) No 68/2013):**

'Former foodstuffs', means foodstuffs, other than catering reflux, which were manufactured for human consumption in full compliance with the EU food law but which are no longer intended for human consumption for practical or logical reasons or due to problems of manufacturing or packaging defects or other defects and which do not present any health risk when used as feed.

**Food (or "foodstuffs"):**

See document 'AC-00 – Introduction'.

**Food company (food business):**

See document 'AC-00 – Introduction'.

**Processor:**

A processor in the sense of this document is:

- A producer of feed materials;
- A producer of compound feed or a producer of additives or a producer of premixtures on the explicit condition that these by-products for reprocessing are processed and used in the installations of the processor, and are not commercialized as 'by-products for reprocessing' or 'feed material'.

## **1.2. Conditions for application**

A FCA company wishing to apply such a specific purchase module must:

- Verify whether the food company has a written HACCP plan in place, including products purchased by the FCA company, and intended for feed;
- Prior to any initial delivery of (former) foodstuffs or by-products for reprocessing, an audit of the food company must be performed;
- perform, each year, a supplier audit of the food company. When the food company is certified according to module 9 'Management of Food Materials for Animal Feed' of the BRC Global Standard for Food Safety, an audit every two years is sufficient;
- Per product purchased from the food business sector, a product sheet / processing sheet (see also 'AT-07: Product sheet for food companies' / 'BT-07/ food companies') is created in mutual consultation, which means that:
  - o Per product and per supplier a hazard analysis is performed. The hazard analysis forms an integral part of the HACCP study of the food business sector;
  - o One should verify whether (former) foodstuffs and/or by-products for reprocessing are compliant with the relevant feed legislation and with the requirements included in the FCA Standard.

- The product sheet/processing sheet is sent by the FCA company to OVOCOM (and to its certification body):
  - o Upon creation and then at least every 3 years;
  - o Also upon any significant changes to product or production process.
- The FCA Company wishing to apply the module in question, should notify OVOCOM and its certification body (OCI) in advance;
- The FCA company provides its certification body with the list of the concerned suppliers and products - purchased under this protocol. Based on this list and on the hazards associated with the purchased products, the OCI determines where the witness (supervision) audit will take place (see CC-01: Certification Rules, point 8.10);
- To be included in the contract between the two parties:
  - o The rights and obligations in order to ensure the FCA Standard as described in the Protocol;
  - o That a witness audit may be performed by an inspection body (OCI), approved by OVOCOM, during the yearly audit of the supplier, which is performed by the FCA company;
  - o That upon any change to product or process the buyer (FCA Participant) shall be notified immediately.
  - o That the food company should make available, to the FCA participant, all necessary information for the joint drafting of a product sheet/processing sheet.
- To check whether, upon any delivery of (former) foodstuffs, or By-products for reprocessing, the commercial document refers to the relevant product sheet/processing sheet.

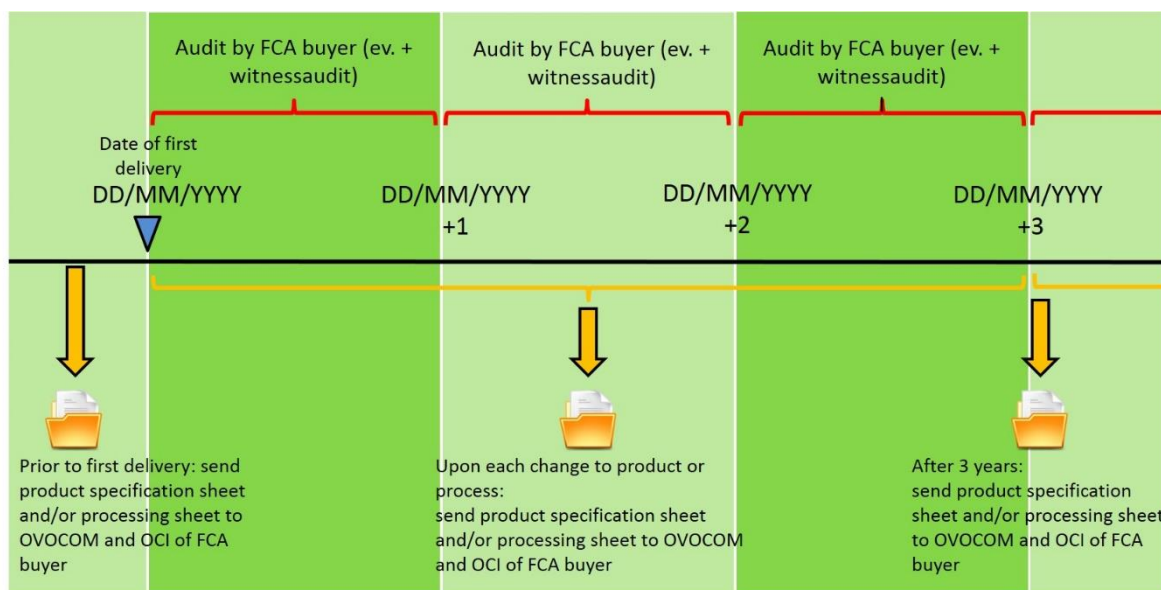


Figure 1 : Schematic summary regarding the evaluation of the food company, by a FCA certified company



### Important requirements

- The FCA certified company shall draw up a list of food companies concerned by the implementation of the Protocol. Also their suppliers should be mentioned on the list. The list will be kept up to date by the FCA certified company. The registration shall contain at least the following information:
  - o Name of company;
  - o Purchased products;
  - o Current version of the product sheet and/or processing sheet, per purchased



### Important requirements

- product;
- o Starting date of supplies (first delivery) (+ if applicable, date of end of collaboration);
- o Date of annual audit + name auditor.
- The FCA certified company that applies such a Protocol, must inform its certification body regarding any changes made to the list of food companies;
- The FCA certified company shall inform its certification body of the way in which the audit is performed, and provide a planning of audits to be carried out at the participating food companies, (as a reminder: they must be audited on a yearly basis);
- The FCA certified company, shall determine the duration of the annual audit for each food company who supply them. The duration of the annual audit does not include the preparation and maintenance of the product sheet and/or processing sheet. It is recommended to apply the duration period mentioned in Table 1 of section 8.1 of document 'CC-01: Rules of certification';
- This list is used as a basis for deciding at which supplier(s) the witness (supervision) audit will be planned;



### Frequency of witness audit by the OCI at the supplier audits

The FCA company wishing to apply this protocol is fully cooperating during the check of the supplier audit by the OCI through accepting this witness (supervision) audit. The OCI auditor is independent as regards the audited food company.

The certification body applies the specific rules mentioned in document 'CC-01: Certification Rules (point 8.10)'.

NB: if the supplier audit of the food company - as part of this protocol - is carried out by a recognized FCA auditor, the witness (supervision) audit of the supplier audit shall not be held.



### Frequency of witness audits by certification body during supplier audits

The FCA company who wants to apply this protocol will fully cooperate with the verification of the supplier audit by the certification body, by accepting a witness audit.

The auditor of the certification body is independent with respect to the food business to be audited.

The certification body concerned shall apply the specific rules set out in the document 'CC-01: Certification Rules' (paragraph 8.10).

Note: if the supplier audits of food business in the context of this protocol shall be performed by an authorized FCA auditor, then there should be no witness of supplier audits.



### Application of the Protocol by a trader in by-products for reprocessing

A processor that has the scope "trade" (VWH) could possibly sell to another processor certified if it meets the following conditions. If all conditions are not met, the product is deemed to be sold without FCA certification:

- the company additionally has a scope trade (VWH), besides the scope 'production'. This company may possibly just have the scope "VWH" if it is integrated in a multi-site or in a group of companies which has a production activity. For the application of this protocol by a



### Application of the Protocol by a trader in by-products for reprocessing

trader, the following possible cases can be considered as 'company':

- a company who has an FCA certificate (an FCA certified company?) (VWH);
- a group of companies having an FCA certificate for a multi-site (the total of companies listed in the annex to the certificate) (including a production scope and scope of trade VWH);
- a group of companies each having an individual certificate (scope VWG and production) but working in a common structure. This structure has to be communicated to OVOCOM for the application of module 3 of BT-04. OVOCOM will assess this structure and will communicate its decision to the company and the certification body concerned;
- the company involves its customer (= FCA certified producer-) in the supplier audit at the food company;
  - Together they carry out the supplier audit;
  - The company delivers the report of the audit to its customer and the product sheet and the latter is also signed by the customer.
- The step 'trade' must also be clearly visible in the processing card (see document BT-07: food companies). This processing card must be communicated to the certification body and OVOCOM.

## 2. Target group for the application of this specific purchase Protocol

FCA certified companies wishing to purchase (former) foodstuffs or by-products for reprocessing, are required to implement the Protocol in question.

In this case it only relates to (former) foodstuffs rather than to regular co-products originating from the food industry (such as beet pulp, brewers' grains, etc.).



### A few examples falling within the purchase Protocol

Broken biscuits, dough residues, sugar, crisps and savory snacks, discarded beer, breakfast cereals, old bread, semi-finished products, ....



### A few examples NOT falling within the purchase Protocol

Cereals, potato peelings, beet pulp, soya (bean) meal, flour shorts, ...

These (former) foodstuffs and/or by-products for reprocessing may be transported via water (by ship, lighter or coaster), via rail or via road.

## 3. Registration with OVOCOM

Module 3 may only be applied by an operator who is certified in compliance with the FCA Standard.



A company, applying such a purchase module, should inform OVOCOM. A email to [info@ovocom.be](mailto:info@ovocom.be), mentioning those (former) foodstuffs / by-products to be purchased will suffice.

The FCA certified company shall send OVOCOM (and the certification body), a product sheet/processing sheet, following the initial audit performed at the premises of the supplier, and prior to the first delivery. Subsequently the company will send OVOCOM (and the certification body) the document(s) following any change(s), and this at least once every 3 years).

The certification body of the FCA company, should also be kept informed by the company.

If the company no longer wishes to make use of the module, they should also inform OVOCOM (and the certification body).

## **4. Monitoring**

### **4.1. General**

The identified CCPs en PAs for purchased products, listed in the hazard analysis of the FCA certified buyer, shall be the subject of an individual batch by batch (analysis) monitoring. These batches must not be included in a sector based monitoring plan, and do not fall within the scope of document 'AT-05: Monitoring'. Different parts of the same product group cannot benefit from a global approach.

### **4.2. Sampling**

- The sampling should be representative and should be performed in a batch by batch manner.
- A delivery of bags (or any other packaging (e.g. cubitainers or barrels)) may consist of two or more batches. In this case the protocol should be applied for each batch that is part of the delivery.
- Bags, (or any packaging (e.g. cubitainers or barrels)) of a same batch of the supplier, may be divided over multiple deliveries. In this case the protocol should be applied only once for the batch, namely upon a first delivery, unless the circumstances require an adjustment of the hazard analysis, and therefore also monitoring. (e.g. external conditions such as temperature variations).
- Any bulk delivery should be considered as a different batch, even if it concerns a same number of batch of the supplier. Where several loading spaces are used, their contents must be equated with as many different batches. The grouping of batches is not allowed.

### **4.3. Analysis**

The monitoring of CCPs and POAs, identified in the hazard analysis, must (mandatory) be performed for any related (former) foodstuff and by-products for reprocessing.

In case no any CCPs or POAs have been identified, one must at least check that the products that have been delivered are identical to product mentioned on the product specification sheet / processing sheet.

The analysis shall be performed by a laboratory complying with the requirements included in document 'BT-11: Sampling and analysis'.

## **5. Communication of analysis results**

There is no obligation to communicate the analysis results.

Compliance with the requirements included in module 3 as well as the analysis results of the monitoring shall be checked upon the FCA audit at the premises of the FCA certified company.