

Document name	RTRS Non-GMO Standard for Producers Version 1.0 For the trading of: - RTRS non-GMO Credits
	 RTRS non-GMO Soy Chain of Custody
Date	26 th April, 2018
Produced by	This document was developed by the Technical Unit of the RTRS in collaboration with E4tech in February 2018 The document was formally endorsed and approved by the Executive Board Members on 26 th of April, 2018 and approved by the GA on 31st of May, 2018.

Mandatory version from April 2018

This is a public document of the Round Table on Responsible Soy Association (RTRS), for any comments regarding the content of this document or the RTRS Standard please contact the:

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The next review is scheduled for May 2023 at the latest. Earlier reviews might be scheduled upon decision by the Executive Board or as required by ISEAL membership requirements.

The RTRS official languages are English, Spanish and Portuguese, however in case of any inconsistency between different versions of the same document, please refer to the English version as the official one.



RTRS non-GMO Standard Module for Producers

I. Introduction

The RTRS non-GMO Standard Module for Producers has been developed on request of the RTRS Executive Board. The compliance with this document will allow them to meet the requirements for supplying RTRS non-GMO credits or RTRS non-GMO soy for Chain of Custody.

II. Scope

This document sets the basis for the requirements that must be met by producers that want to sell: Option 1) RTRS non-GMO credits or Option 2) RTRS non-GMO soy Chain of Custody.

This does not exclude the producer from complying with the requirements of the RTRS Production Standard. When this module is used in conjunction with the group and multi-site certification standard, the group manager and all the group members shall comply with the requirements of this module.

In case of sale of non-GMO soy by physical flow:

- ✓ the producer shall also comply with the Point VII (4.Handling of material).
- ✓ The following actor of the chain after the producer must comply with the requirements of the general Chain of Custody Standard and particularly the module D to maintain the RTRS non-GMO identity.
- ✓ The soy supply chain includes the following operators: producers (growers), traders crushers, refining, storage operators and others and takes into account storage and transportation up until the point the product is delivered to the determined end-user.

Communication of RTRS non-GMO data, referred to in the document of RTRS Use of the Logo & Claims Policy, can only be made if all the required operators involved in the process has been successfully assessed against the RTRS non-GMO Module Requirements for Producers and related documents. The unit of certification is the organization's physical site.

III. Changes from previous version of this document

N/A

IV. How to use this document

The RTRS non-GMO Standard Module for Producers includes the following sections:

- V Definitions
- VI List of Acronyms
- VII Compliance Requirements for Producers

Producers and auditors using this document to assess compliance must also refer to the RTRS Production Standard.

V. List of Acronyms

DNA	Deoxyribonucleic Acid
GMO	Genetically Modified Organism
PCR	Polymerase Chain Reaction
RTRS	Round Table on Responsible Soy Association (RTRS)



VI. Compliance Requirements for Producers Scope

1.0 Requirements for soy producers

1.1 The organization growing soy shall ensure that seed material and any other agriculture inputs are from non-GMO strains.

1.2 The organization growing soy shall maintain certificates of origin, receipts and other relevant documentation for all seed purchased. When their own seed is used from one harvest to the next, records of the origin of the original seed shall be maintained.

1.3 When machinery (including the planters, harvesters, transporters, etc.) and/or storage units are shared with GMO plots or with other producers that may be using GMO strains, all machinery shall be thoroughly cleaned before being used on non-GMO plots.

1.4 The organization growing non-GMO soy shall work with adjacent GMO growers to maintain a safe distance from GMO crops and implement physical barriers as necessary, to prevent drift of GMO material. (See also indicator 5.10.1 of the RTRS Production Standard)

1.5 The soybean harvested shall not contain GMO residues greater than 0.9% (or lower limits if specified by clients or legislation).

Note: GMO DNA that is not authorized in the receiving country cannot be included, even at low levels of adventitious presence i.e. there is no acceptable level for un-authorised GMO DNA in the receiving country.

2.0 Testing non-GMO Identity

2.1.1 Applicable only for non-GMO Credits: The organization shall conduct semi-quantitative real-time polymerase chain reaction (PCR) to validate the GMO status of soy materials at harvest time in each of the applicable farms and without considering the supply of the grain into the warehouse/silo as part of this process. In order to guarantee the sampling and non-GMO status, a third party shall be involved in this process. Any laboratory conducting semi-quantitative tests for the presence of GMO DNA on their behalf must be competent to do so. Laboratories undertaking PCR tests must be accredited for PCR testing by a recognized Accreditation Body.

2.1.2 Applicable only for Chain of Custody: The organization shall conduct semi-quantitative real time polymerase chain reaction (PCR) to validate the GMO identity of soy materials they receive and where the organization is growing soy, of the soybeans they supply. Any laboratory conducting semi-quantitative tests for the presence of GMO DNA on their behalf must be competent to do so. Laboratories undertaking PCR tests must be accredited for PCR testing by a recognized Accreditation Body.

Note: For producers selling soy by physical flow, it is not expected that producers should be responsible for carrying out tests for presence of GMO material on their harvest; however in these cases there must be evidence that the first buyer does the testing.

2.2 Sampling must consider not less than 15% of the total production per plot and not less than one sample for every 800 tons. To conduct the sampling, the producer must estimate at least 15% of the total production in each plot and extract a sample every 800 tons.

Example: A plot produces 10,000 tons \rightarrow Sample size: 1,500 tons (15%). Two samples shall be taken: a) from 0 to 800 tons and b) from 801 to 1,500 tons.

2.3 A formal risk assessment must be undertaken of the GMO presence at the required level of origin of every input and potential cross-contamination during subsequent handling, transport, storage and processing, if applicable.



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2.4 The organization must ensure that the accidental presence of GMO DNA in any input materials supplied to them is <0.9% per mass (or lower levels if specified by clients or legislation).

Note: GMO DNA that is not authorized in the receiving country cannot be included, even at low levels of adventitious presence i.e. there is no acceptable level for un-authorised GMO DNA in the receiving country.

2.5 Where DNA is absent or where the DNA is so disrupted as to be undetectable, organizations must demonstrate that the materials have been derived from products or processes of non-GMO status by demonstrating segregation back to the point where DNA testing can be considered valid.

VII. Handling of material (Applies to soy producers and all organizations in the supply chain)

1.0 Critical control points

1.1 Where the organization is simultaneously handling Non-GMO and GMO products or products of unknown status, it shall ensure that inputs into the RTRS Non-GMO system meet the RTRS Non-GMO requirements.

1.2 The organization shall ensure the supporting documentation and test results confirm the non-GMO status of the material before it is mixed with other non-GMO material on site.

2.0 Material accounting system for RTRS data

2.1 Non-GMO data shall not be allocated to GMO products or products of unknown status. If this occurs, the material shall lose its non-GMO status.

2.2 Where a segregated chain of custody system is in place for RTRS data, the organization shall ensure that allocation of RTRS data to customers is consistent with the actual physical product delivered, including both RTRS certification and the Non-GMO status. The requirements of Module B of the Chain of Custody Standard shall also apply.

2.3 Where a mass balance chain of custody system is in place for RTRS data, the sustainability characteristics (including the RTRS certified status) can be allocated to other Non-GMO material, even if the other Non-GMO material did not originate from an RTRS certified farm. This is only permitted if the other Non-GMO material meets the requirements that RTRS set to decide non-GMO identity. The requirements of Module A of the Chain of Custody Standard shall also apply.

Note: Non-GMO data cannot be allocated to GMO products or products of unknown status in an RTRS mass balance system.

3.0 Use of RTRS Trading Platform for RTRS non-GMO credits¹

3.1 RTRS certified soy producers having demonstrated compliance with the above requirements are entitled to issue RTRS non-GMO credits via the RTRS Trading Platform² (one credit per ton of RTRS non-GMO soy).

3.2 The RTRS non-GMO credits have 5 years of validity from the date these are uploaded on the platform to be sold by the producers.

3.3 Operators handling soy, soy derivatives and/or soy products may purchase RTRS non-GMO credits via the RTRS Trading Platform. RTRS non-GMO credits may be used within two calendar years since the year of purchase.

3.4 On-product and off-product claims related to RTRS non-GMO credits shall comply with RTRS Use of the Logo & Claims Policy.

¹ The terms mentioned in this point can be reviewed and modified independently

² https://platform.responsiblesoy.org