



LETTER OF CONFORMANCE

GLOBALG.A.P. NON-GM/"Ohne Gentechnik"

According to GLOBALG.A.P. NON-GM/"Ohne Gentechnik" Add-on

Version 1.1 – January 2020

Letter of Conformance No
286511-2019-GLOBALGAP-NOR

Date of Assessment
2024-02-22

Valid
from 2024-05-14 to 2025-05-13

Registration No.: DNV
CERT13372016GGNORACCREDIA

GGN Number: 4050373823641

Issued to

Skretting AS

Sjøhagen 15, 4016 Stavanger

Country of production: **Norway**

The Annex contains details of the producers included in the scope of this Letter of Conformance

DNV Business Assurance Italy S.r.l. declares that the producer/company mentioned on this Letter of Conformance complies with the GLOBALG.A.P. NON-GM/"Ohne Gentechnik" Add-on Assessment Module 1: Compound Feed Manufacturing Company for the below mentioned product(s)/product scope..

Product (Scope)	Process description	Number of (Production) Sites
Compound feed for aquaculture	Farming	3

This Letter of Conformance is only valid as long as the GLOBALG.A.P. IFA and/or CFM and/or CoC certificate is valid

Place and date:
Vimercate (MB), 2024-04-02

Karen M. Eckhoff
Lead auditor

For the issuing office:
DNV - Business Assurance
Via Energy Park, 14 - 20871 Vimercate (MB) - Italy

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Management Representative





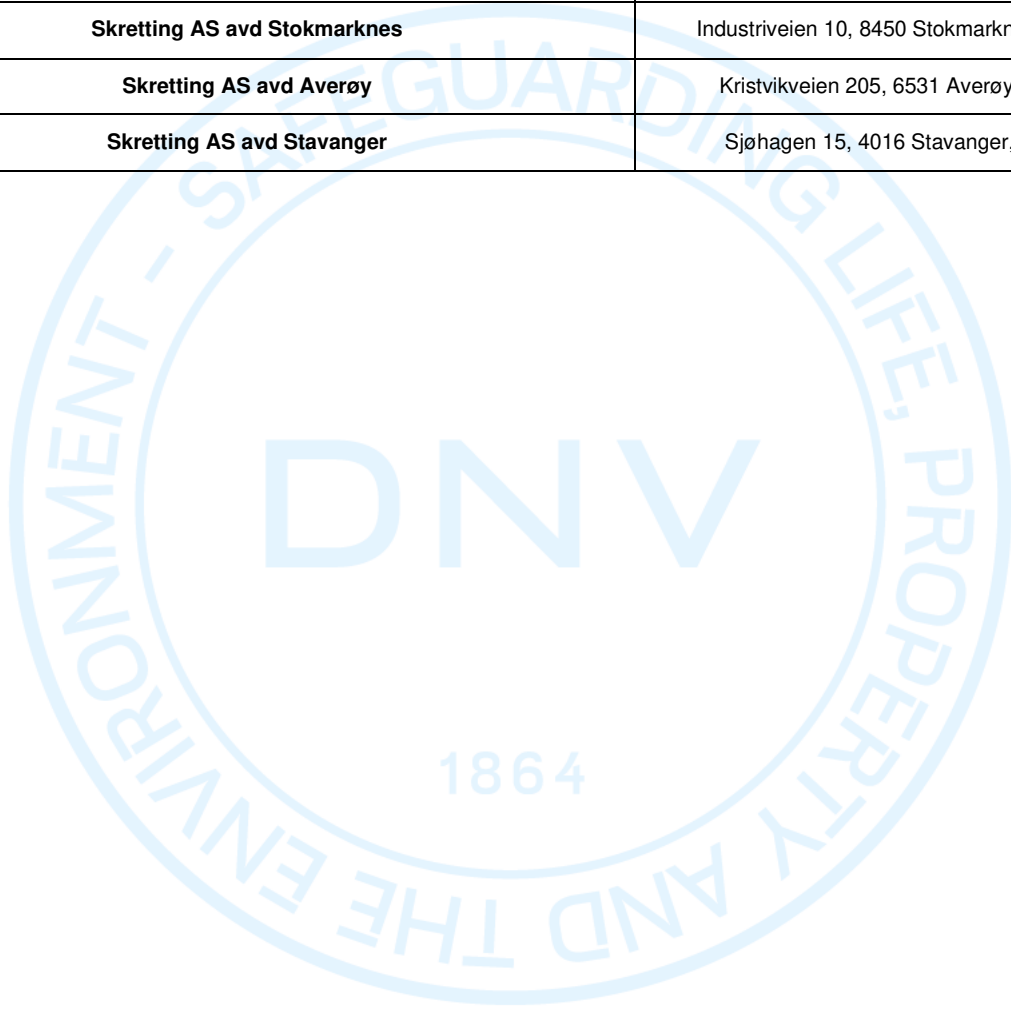
Letter of Conformance No: 286511-2019-GLOBALGAP-NOR
Place and date: Vimercate, 2024-04-02

Annex for Letter of Conformance – GGN 4050373823641

Date of issue 2024-04-02

Production Sites

Site name	Address
Skretting AS avd Stokmarknes	Industriveien 10, 8450 Stokmarknes, Norway
Skretting AS avd Averøy	Kristvikveien 205, 6531 Averøy, Norway
Skretting AS avd Stavanger	Sjøhagen 15, 4016 Stavanger, Norway



GLOBALG.A.P. + ADD-ON

NON-GM / "OHNE GENTECHNIK" ADD-ON FOR THE AQUACULTURE AND LIVESTOCK SECTOR Module 1: Compound Feed Manufacturing Company

CHECKLIST

ENGLISH VERSION 1.1

VALID FROM: 1 JANUARY 2020

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N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM	MANUFACTURING OF NON-GM / OHNE GENTECHNIK COMPOUND FEED						
	<i>Control points in this module are applicable to all compound feed manufacturers seeking certification according to the NON-GM compound feed manufacturing Add-on located and operating in EU Member States where the EU REGULATIONS NO. 1829/2003 and NO. 1830/2003 are mandatory and in force or located and operating in countries where local legislation is equivalent to these EU REGULATIONS or to countries where the commercial cultivation and import of GMOs is prohibited by law.</i>						
NON-GM CFM 1	DESCRIPTION OF THE COMPOUND FEED MANUFACTURING FACILITY						
NON-GM CFM 1.1	Is there a written organizational chart that assigns the responsibilities for the NON-GM / "Ohne Gentechnik" compound feed manufacturing including a proxy (deputy plan) to cover the absence of the responsible production manager?	There shall be a written organizational chart that assigns the responsibilities for the NON-GM / "Ohne Gentechnik" manufacturing of compound feed according to the NON-GM requirements including a deputy plan to cover the absence.	Major Must		x		The organization has an written organization chart that present in their quality system DMS. The procedure is DMS-103573.
NON-GM CFM 1.2	Are the specifications for NON-GM feed ingredients available that prove that these are NON-GM?	There shall be specifications available for the NON-GM feed ingredients that prove that these are NON-GM.	Major Must		x		All feed materials have their own specification in DMS, referring to the non-GM procedure DMS-08878. In DMS-08878 it is specified which feed ingredient is a high risk material and needs IP certification (Identity Preservation). Soya which is the only raw material they buy which is high risk is purchased with IP certificate. Specification has security role DMS-SKRNO-Crit. Main office is responsible for all feed materials purchased. Verified for SPC NON GMO in bulk, delivered february 2023, LOT 001571828. Traceability certificate of compliance foodchain ID non-gmo global standard seen. Cert.no BR63733. 31 august 2022.

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NON-GM CFM 1.3	Is a specific list available of the suppliers that deliver NON-GM materials/feed ingredients?	A specific list of the suppliers that deliver NON-GM materials/feed ingredients shall be available.	Major Must	x			List of suppliers of raw materials are found in ISAM. An updated list can be retrieved any time based on Norway (300) and SPC (10005390). Also a list can be retrieved based on the name "NGMO". Main office responsible: List of suppliers that deliver NON-GM feed verified in the audit. Ref: Exempel of supplier who deliver NON-GM feed is Koster Marin Proteins Gmbh. Verified for SPC NON GMO in bulk.
NON-GM CFM 2	STAFF TRAINING FOR NON-GM PRODUCTION OF COMPOUND FEED						
NON-GM CFM 2.1	Is there an annual training of all staff members involved in the operating procedures of the NON-GM / "Ohne Gentechnik" production of compound feed?	There shall be an annual training of all staff members that are involved in the operating procedures related to the production of compound feed according to the NON-GM / "Ohne Gentechnik" requirements.	Major Must	x			Annual training of all staff member performed at PN and PS and PM for 2023. E-learning course with exam, with approved. All employees in all factories verified. The course is in "Workday". Verified that this is completed for the workers for 2023 in a list with "completed" electronically.
NON-GM CFM 2.2	Is there a documentation of the annual training on the NON-GM / "Ohne Gentechnik" requirements detailing the training date, the training location, the instructor, the content, and the attendees?	The annual training on the NON-GM / "Ohne Gentechnik" requirements shall be documented regarding the training date, location, instructor, content, and the attendees.	Major Must	x			Annual training of all staff member performed at PN and PS and PM. E-learning course with exam, with approved. All employees in all factories verified. The course is in "Workday". Details of training date given.
NON-GM CFM 2.3	Is there a documented initial training of all new staff members involved in the production of NON-GM feed?	The initial training of all new staff members involved in the production of NON-GM feed shall be documented regarding training date, location, instructor, content, and attendees. The training shall take place before the new staff members are integrated in the processing procedures.	Major Must	x			The initial training in "Workday". It is mandatory for all new staff to do the course. There are two documents describing this and GMO is mentioned (DMS-91404 og DMS-91405). Verified conducted for one of the operators at the mixing department (Morgan Jonsson) Conducted NON-GM course 17.1.2024

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 3	INCOMING GOODS INSPECTION AND SEGREGATION						
NON-GM CFM 3.1	Is it ensured in the goods receiving department by means of documentation that only NON-GM feed materials are used for the production and/or the labeling of compound feed according to the requirements for the production of food labeled NON-GM / "Ohne Gentechnik"?	In the goods receiving department it shall be ensured by means of the delivery notes that only NON-GM feed materials are used for the production and/or the labeling of compound feed according to the requirements for the production of food labeled NON-GM / "Ohne Gentechnik".	Major Must	x			<p>All feed ingredients purchased are NON-GM. The main office is responsible for purchasing and approval of them. For the high risk feed material (SPC) described in procedure DMS-08878 it will be checked that the IP-certificates is delivered in from the supplier.</p> <p>Verified for SPC NON GMO in bulk, delivered february 2023, LOT 001571828. Traceability certificate of compliance foodchain ID non-gmo global standard seen. Cert.no BR63733. 31 august 2022.</p>

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 3.2	Is there a self-monitoring concept including a risk assessment of the compound feed manufacturing business for the segregated handling of GM and NON-GM feed as well as any possibility of introduction and contamination?	<p>There shall be a self-monitoring concept including a risk assessment of the compound feed manufacturing business for the segregated handling of GM and NON-GM feed as well as any possibility of introduction and contamination.</p> <p>The risk assessment shall include the cleaning processes.</p> <p>The self-monitoring and risk assessment concept of the feed business shall comprise at least the following criteria:</p> <ul style="list-style-type: none"> • Compilation of all NON-GM and GM feed of the feed manufacturing business. • Segregated handling of NON-GM and GM feed at all stages of storage, processing, and transport. • Identification and exclusion of sources of contamination and carryover. • Individual, batch-specific, written risk assessment of single-component feeds with a transparent risk grading (at risk / not at risk). • Specifications for all finished compound feed products. • Mixing protocols shall be available. 	Major Must	x			It is risk-assessed that the risk for NON GMO is only relevant when approving raw material. There is no risk of contamination with NON GMOs after the raw material has entered the factory, since no production of GM-feed or use of GM raw materials (Ref. Norwegian Legislation)

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 3.3	Is there a risk-based sampling and analyzing plan of feed implemented according to the risk assessment of Control Point NON-GM CFM 3.2 and as required in ANNEX 1?	There shall be a risk-based sampling and analyzing plan of feed implemented according to the risk assessment of Control Point NON-GM CFM 3.2 and as defined in ANNEX 1. In case there are no GM plant raw materials approved by the authorities of the country of production for use in animal feed, and all preceding analyses in the first year of sampling have proven to be in compliance with the requirements for NON GM feed production, then in the second year the frequency may be reduced to 50% and in the third and following years may be reduced to 25% of the required samples according to ANNEX 1.	Major Must	x			Skretting annually analyze a number of samples in the factory to document that the feed is NON GM.They analyze based on amount of feed from customers ordering NON GM feed. The main part of the samples comes from Averøy, which produces the largest amount of feed labelled NON GMO. In 2023 they analyzed 9 samples. Main office responsible and makes the plan. Non-GMO analyse verified for fish feed: Spirit Trout 0020664213 analysed by Eurofins 18.9.23, and is verified non-gm.
NON-GM CFM 3.4	Are the analyses requested in Control Point NON-GM CFM 3.3 performed in an ISO 17025-accredited laboratory, and do the analytical procedures follow the requirements outlined in Annexes 2 and 3?	The analyses requested in Control Point NON-GM CFM 3.3 shall be performed in an ISO 17025-accredited laboratory and shall follow the methodological and analytical procedures outlined in Annexes 2 and 3.	Major Must	x			The laboratory that performs GMO analyzes in feed ingredients is accredited. Analysed by Eurofins GeneScan GmbH, Freiburg DIN EN ISO/IEC 17025:2018 DAKKS D-PL-17111-01-00

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 3.5	Is it ensured by documentation of storage and production processes and by verification of implementation of these measures that at no time GM raw materials or GM feed can make their way into the flow of raw materials and feed intended for NON-GM feed production?	It shall be ensured by documentation of storage and production processes and by verification of implementation of these measures that at no time GM raw materials or GM feed can make their way into the flow of raw materials and feed intended for NON-GM production.	Major Must			x	N/A: Import of GM rawmaterial and feed is not allowed, prohibited by Norwegian legislation.
NON-GM CFM 3.6	Does GM feed have the correct labeling and is it identifiable at all steps of storage and production?	GM feed shall have the correct labeling and shall be identifiable at all steps of storage and production. N/A if no GM feed present or used at compound feed manufacturing site. N/A in countries where the commercial cultivation and import of GMOs is not approved by the authorities of the country of production or prohibited by law.	Major Must			x	N/A: No production of GM-feed or use of GM-raw materials (Ref. Norwegian Legislation).
NON-GM CFM 3.7	Are the individual operative and risk-oriented procedural steps documented in a separate document for the avoidance of comingling and for the segregation of commodity flows?	To avoid the comingling and to verify the segregation of commodity flows, the individual operative and risk-oriented procedural steps shall be documented in a separate document. N/A in countries where the commercial cultivation and import of GMOs is not approved by the authorities of the country of production or prohibited by law.	Major Must			x	N/A: No production of GM-feed or use of GM-raw materials (Ref. Norwegian Legislation).

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 3.8	Does the compound feed manufacturer take responsibility to conduct a minimum of one internal self-assessment per year against the GLOBALG.A.P. NON-GM Add-on Standard Module 1 Compound Feed Manufacturing?	There shall be documented evidence that one internal self-assessment per year has been completed under the responsibility of the compound feed manufacturer against the GLOBALG.A.P. NON-GM Add-on Standard Module 1 Compound Feed Manufacturing. The self-assessment checklist shall contain comments of the evidence observed for all non-applicable and non-compliant control points. This shall be done before the CB inspection (See General Rules for the NON-GM Add-on Standard).	Major Must	x			Internal self-assessment performed in Q2 (week 12) 2023 by Tove Nesø Askeland. It is confirmed in the self-assessment that there has been no production of NON-GM feed or use of GM-raw material at Sketting.
NON-GM CFM 4	RETENTION TIMES OF DOCUMENTATION AND TRACEABILITY						
NON-GM CFM 4.1	Are all documents in context with the labelling of finished compound feed according to "Suitable for the production of food labeled "NON-GM"/ "Ohne Gentechnik" retained for at least five years from the date of delivery of the finished compound feed?	All documents in context with the labelling of finished compound feed according to "Suitable for the production of food labeled "NON-GM" / "Ohne Gentechnik" shall be retained for at least five years from the date of delivery of finished compound feed unless legal requirements stipulate a longer retention period . This addresses specifically delivery bills, invoices, purchase orders, declarations and specifications of seed, means of production and the type of finished feed.	Major Must	x			All the documentation of raw material and finished feed are retained for at least 5 years. Skretting started in 2019 to produce feed labelled with NON-GM.

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 4.2	Is it possible to trace the compound feed labeled with the claim "Suitable for the production of food labeled NON-GM / "Ohne Gentechnik"" back to the source of production within one working day and to compile quantitative statements and evaluations that permit conclusions on the flow of goods and their plausibility?	A traceability system shall be in place that at all times enables the instant and unmistakable identification of all compound feed labeled with the claim "Suitable for the production of food labeled NON-GM / "Ohne Gentechnik"". Products shall be traceable back to the source of production within one working day providing compilation of quantitative statements and evaluations that permit conclusions on the flow of goods and their plausibility.	Major Must	x			Skretting main office together with the factories has conducted traceability tests in march 13.3.2023 on compound feed labeled with NON-GM. The traceability is performed within one working day with GLT (graphical Lot tracker). The test was done for the feed: CQ Ecopolar N3 2500 50A-9 750 kg ID.0015711816. Documentation of the traceability test was verified in the audit. Customer Cermaq. Verificates that Soy SPC NON-GM.

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 4.3	Does the feed mill follow a sampling and analyzing procedure on finished compound feed labeled with the claim "Suitable for the production of food labeled NON-GM / "Ohne Gentechnik"?"	<p>The feed mill shall follow a sampling and analyzing procedure on finished compound feed labeled with the claim "Suitable for the production of food labeled NON-GM / "Ohne Gentechnik" as expressed in ANNEX 1.</p> <p>The analyses must be performed in an ISO 17025 accredited laboratory.</p> <p>In case there are no GM plant raw materials approved by the authorities of the country of production for use in animal feed and all preceding analyses in the first year of sampling have proven to be in compliance with the requirements for NON GM feed production, then in the second year the frequency may be reduced to 50% and in the third and following years may be reduced to 25% of the required samples according to ANNEX 1.</p>	Major Must	x			The feed mill follow a sampling and analyzing procedure on finished compounded feed described in DMS procedure-08666 which includes sampling of feed for GMO-screening.

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 4.4	Are the analyses requested in Control Point NON-GM CFM 4.3 performed in an ISO 17025-accredited laboratory and do the analytical procedures follow the requirements outlined in Annexes 2 and 3?	The analyses requested in Control Point NON-GM CFM 4.3 shall be performed in an ISO 17025-accredited laboratory and shall follow the methodological and analytical procedures outlined in Annexes 2 and 3.	Major Must	x			The laboratory that performs GMO analyzes is accredited. The external laboratory used for this is Eurofins in Germany "Eurofins GeneScan", they perform validated real-time PCR tests for GMO testing. Analyzes and sample material in Skretting are according to Annexes 2 and 3. DMS-08666 "Monitoring quality feed", says how much sample material to submit. It says 400 g which is also in Annex 2. Verified by CQ Ecopolar N3 2500 50A-9 750 kg ID.0015711816. Verificates that Soy SPC NON-GM.
NON-GM CFM 4.5	Does the feed mill retain samples of all NON-GM feed batches delivered to customers and are these retained for a period of time appropriate to the intended purpose and shelf life of the feed?	The feed mill shall retain samples in suitable containers of all NON-GM feed batches delivered to customers. These reference samples shall be retained for a period of time appropriate to the intended purpose and to the shelf life of the feed. This applies both to feed delivered in bulk or packaged.	Major Must	x			Yes, the factory has reference samples of all NON-GM feed batches delivered to customers in case of complains. They are stored in a suitable place, and are stored for 2 years.
NON-GM CFM 5	CRISIS MANAGEMENT						

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 5.1	Is there a written crisis management system in place with an analysis of potential dangers?	There shall be a written crisis management system in place with an analysis of potential dangers. The course of action of the system shall be described. The emergency numbers plus the contact details of suppliers and clients shall be part of it.	Major Must	x			Yes, the DMS-72316 Emergency Plan describes how skretting Norway relates to a food safety/quality crisis. This contains contact information and information about where to communicate and organize in the event of a crisis and contact details of suppliers/clients. Ref. last version (V4) 12.9.2022.
NON-GM CFM 5.2	Is there an internal system in place to block compound feed from delivery that is detected as not being compliant with the declaration "Suitable for the production of food to be labeled NON-GM / "Ohne Gentechnik"?"	There shall be an internal system in place to block compound feed from delivery that has been manufactured but is detected to be not in compliance with the requirements as required for the declaration "Suitable for the production of food to be labeled NON-GM / "Ohne Gentechnik"". The principle of precaution shall be the policy for the execution of the blocking system.	Major Must	x			There is a routine to block compound feed which is not compliant with the declarations. Quality Manager in Stavanger coordinates this when needed, but it is always the local Quality Manager in the factories or Warehouse Manager who actually changes the status of M3. DMS-08671 is describing routines with regard to unwanted substances, blocking of feed ingredients and compound feed and also food recall (see NC)
NON-GM CFM 6	DECLARATION ON DELIVERY NOTES AND BILLS "NON-GM" / "Ohne Gentechnik"						
NON-GM CFM 6.1	Is there a statement on the delivery notes and on the invoices declaring that the supplied compound feed is "Suitable for production of food labeled NON-GM / "Ohne Gentechnik"?"	There shall be a statement on the delivery notes and on the invoices declaring that the supplied compound feed is "Suitable for the production of food labeled NON-GM / "Ohne Gentechnik"".	Major Must	x			For ordering of NON GM feed, invoice and delivery note are labeled with NON-GM. Verified for feed to Salma Farming AS, Korsneset, delivered by vessel Pioner 22.2.2023, amount 70.500 kg + 38.806 kg. Verified stated "Suitable for production of food labeled NON-GM/"Ohne Gentechnic". Also delivery note verified 22.2.2023 with the same statement.

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM CFM 7	TRANSPORT OF FINISHED NON-GM COMPOUND FEED						
NON-GM CFM 7.1	Are transporters of NON-GM finished compound feed described and labeled with the claim “Suitable for the production of food to be labeled NON-GM / “Ohne Gentechnik”” monitored regularly by approved quality assurance schemes for transporters?	Transporters that are commissioned carriers of finished compound feed labeled with the claim “Suitable for the production of food to be labeled NON-GM / “Ohne Gentechnik”” shall be monitored regularly by approved quality assurance schemes for transporters (e.g. GMP+ or other). N/A in case there is no import and no use of GM raw materials in the country of production based on official regulations/policy.	Major Must			X	N/A: No import or use of GM raw materials allowed in Norway (ref. Norwegian legislation).