

## Skal GM-free production checklist

Together with Biologica, Skal has initiated the 'GM-free organic production assurance' project, which aims to support the efforts of the agricultural business community to meet the GM-free production requirement. So far, five 'GM-free production' information bulletins have been published to inform you of project developments.

Gene technology (also known as genetic modification, genetic engineering or gentech) is the artificial creation of new properties in organisms (i.e. humans, plants, animals and micro-organisms). It involves the modification of genetic material, DNA, in a way that does not occur in nature. An organism whose properties have been altered in this way is called a genetically modified organism or GMO.

As an organic farmer or processor, you may not use GMOs or GMO-derived products.

If your equipment and vehicles have been used to transport or process conventional products, this may be a way for GMOs to enter your company. To avoid this, take the following preventive measures:

**Transport:** use clean vehicles, bulk IP systems, suitable transport for small lots

**Incoming goods inspection:** check for damaged packaging

**GMOs entering the company via equipment use:** clean hired-out equipment, equipment of contract workers, conveyors, etc. used at your company or for your products

**Combined conventional and organic production and storage:** ensure strict separation of organic and conventional production and storage to prevent contamination

If you use permissible conventional products, you run the risk that the product is GM or GMO-derived. To ensure GM-free production, you must ascertain whether, and if so, prove that the original organism is GM-free. Usually, you will need a GM-free declaration from the supplier, stating that the last original organism bringing about the actual conversion of the raw material is a non-GM. This means that:

soya plants used in soya lecithin must be non-GM

starter used in buttermilk powder must be non-GM

micro-organisms used to produce enzymes must be non-GM

micro-organisms used to produce ascorbic acid must be non-GM

manure must be from non-GM animals

micro-organisms used in compost and responsible for the conversion of raw residues into organic substances must be non-GM

There are also conventional products which cannot be produced with the help of GMOs, for example unrefined sea salt or coarse rock salt. In that case it is not necessary to ask your supplier to confirm this. The next pages contain two lists of these products; one list for Preparation and one for Agriculture. After these lists you find two specimen of a GM-free declaration for the conventional products which do not occur on these lists; one for conventional raw materials and additives, and one for starting material not included in the list of varieties.

# GM-free production checklist: Preparation

A GM-free declaration is required for all conventional ingredients:

Examples for which a GM-free declaration is required:

<b>Agricultural conventional ingredients</b> <i>box 6C Skal product specification</i>	<b>Non-agricultural ingredients</b> <i>box 6D Skal product specification</i>	<b>Technical agents</b> <i>box 6E Skal product specification</i>
<b>Annex VI.C</b>	<b>Annex VI.A</b>	<b>Annex VI.B</b>
Sunflower oil Palm oil Fructose	conventional natural flavours, preparations based on micro-organisms (i.e. cultures, starters, yeast, vitamins and amino acids)	technological agents in accordance with Food Product Labelling Commodities Act Decree

**Except for the list below:**

(a GM-free declaration is not required)

<b>Agricultural conventional ingredients</b> <i>box 6C Skal product specification</i>	<b>Non-agricultural ingredients</b> <i>box 6D Skal product specification</i>	<b>Technical agents</b> <i>box 6E Skal product specification</i>
<b>Annex VI.C</b>	<b>Annex VI.A</b>	<b>Annex VI.B</b>
Dairy products, unless imported from outside the EU Gelatine, unless imported from outside the EU Algae and seaweeds	E 170 Calcium carbonate E 290 Carbon dioxide E 401 Sodium alginate E 402 Potassium alginate E 406 Agar E 407 Carrageenan E 413 Tragacanth E 416 Karaya gum E 501 Potassium carbonates E 503 Ammonium carbonates E 504 Magnesium carbonates E 516 Calcium sulphate  E 524 Sodium hydroxide E 551 Silicon dioxide E 938 Argon E 941 Nitrogen E 948 Oxygen Minerals Water Salt	E 170 Calcium carbonate E 290 Carbon dioxide E 500 Sodium carbonates E 501 Potassium carbonates E 513 Sulphuric acid E 516 Calcium sulphate E 524 Sodium hydroxide E 526 Calcium hydroxide E 551 Silicon dioxide E551c Diatomaceous earth E 558 Bentonite E 559 Kaolin E 941 Nitrogen Ethylene Gelatine, unless imported from outside the EU Talc Water  <b>Animal feeds Annex II.D</b> E 599 Perlite E 551b Colloidal silicon dioxide E 551c Diatomaceous earth E 558 Bentonite E 559 Kaolinitic clay E 561 Vermiculite E 562 Sepioliet feeds of mineral origin: (cf GM-free production checklist Agriculture)

# GM-free production checklist: Agriculture

**A GM-free declaration is required for all conventional ingredients:**

**Examples for which a GM-free declaration is required:**

Sowing seeds and propagating material, fertilisers and soil improvers (i.e. compost, vinasse, vegetable by-products), pesticides (i.e. bacterial preparations, vegetable oils)

Preparations for the conservation of grass, corn or whole plant silage (i.e. Kemlac, molasses, Inculant), preparations for improved composting or soil fertility.

Feed containing conventional raw materials and adjuvants (i.e. mixed feeds, vitamin/mineral mixtures, additional feeds).

Conventional animals imported from outside the EU, products for the prevention of parasites and diseases in buildings and equipment, conventional litter

**Except for the following list:**

**Rock meal, peat and clay**

**Elementary sulphur, minerals and trace elements**

**Metaldehyde**

**Pesticides traditionally used in organic farming:**

ethylene and potassium alum, fatty acid potassium salt, paraffin oil, potassium permanganate, quartz sand, sulphur (Annex II.B, part IV)

**Feeds of mineral origin:** unrefined sea salt, coarse rock salt, sodium sulphate, sodium carbonate, sodium bicarbonate, sodium chloride, potassium chloride, lithotamnion and maerl, shells of aquatic animals (including cuttlefish bones), calcium carbonate, calcium lactate, calcium gluconate, bicalcium phosphates (bone precipitates), defluorinated dicalcium phosphate, defluorinated monocalcium phosphate, monosodium phosphate, potassium magnesium phosphate, calcium sodium phosphate, anhydrous magnesia, magnesium sulphate, magnesium chloride, magnesium carbonate, magnesium phosphate, sodium sulphate (Annex II.C.3)

**Trace elements:** iron: ferrous(II) carbonate, ferrous(II) sulphate, ferrous(III) sulphate (monohydrate), ferrous(III) oxide, iodine – calcium iodate (anhydrous), calcium iodate (hexahydrate), sodium iodide, cobalt: cobaltous(II) sulphate (monohydrate and heptahydrate), basic cobaltous(II) carbonate (monohydrate), copper: copper(II) oxide, basic copper(II) carbonate (monohydrate), copper(II) sulphate (pentahydrate), manganous: manganous(II) carbonate, manganous(II) and manganous(III) oxide, manganese(II) sulphate (monohydrate or tetrahydrate, or both), zinc: zinc carbonate, zinc oxide, zinc sulphate (monohydrate or tetrahydrate, or both), molybdenum – ammonium molybdate, sodium molybdate, selenium – sodium selenate, sodium selenite (Annex II.D, 1.1)

**Binding agents, diluents and solidifiers for animal feed:**

E 551b Colloidal silicon dioxide, E 551c Diatomaceous earth, E 558 Bentonite, E 559 Kaolinitic clay, E 561, E 562 Sepiolite Vermiculite, E 599 Perlite (Annex II.D, 1.6)

**Manure:** provided it does not come from trial or research farms or from outside the EU

**Straw from the Netherlands,** provided it does not come from trial or research farms or from outside the EU

**NAK-certified sowing-seeds and propagating material** with a 'normal' NAK label. If the species is genetically modified, it is indicated on the label. NAK: (Dutch General Inspection Service for agricultural seeds and seed potatoes)

**Animal medication containing GMOs are allowed if other medication is not available.**

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# GM-free declaration for conventional raw materials and additives

## A COMPANY DETAILS:

- A.1 Name and address of receiving party : .....  
: .....  
: .....
- A.2 Name and address of supplier/last processor : .....  
: .....  
: .....
- A.3 Product name and trade name of the supplied product : .....  
: .....
- A.4 Date of delivery : .....  
and/or  
Delivery stamp (traceable code) : .....  
and/or  
Duration of declaration (maximum of one ear) : .....

## B THE DECLARATION:

*"The product in question has been produced without the use of genetically modified organisms and/or products derived from these. All relevant safety precautions have been taken to prevent contamination with genetically modified organisms or products derived from these."*

## C SUPPLIER AUTHENTICATION:

- C.1 Date : .....
- C.2 Place : .....
- C.3 Name and position : .....
- C.4 Company stamp and signature : .....

### N.B.:

- Genetically modified organisms as defined in EU Directive 2001/18/EC.
- A certificate issued by a certification body for GM-free production recognized by Skal can be sent instead of this declaration.

