



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
282721-2019-GLOBALGAP-NOR-DNV

Date of Assessment
2024-02-29

Valid
from 2024-03-27 to 2025-03-26

Registration No.: DNV
CERT17102018GGNORACCREDIA

GGN Number: 4059883847161

Issued to

Osland Genetics AS

Osland Brygge, Sørsidevegen 2966, 5962 Bjordal

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 2: Farm/Producer Version 1.1 for the below mentioned product(s)/product scope..

Product (Scope)	Process description	Number of (Production) Sites
Atlantic salmon [Salmo salar]	Farming	1
Rainbow trout [Oncorhynchus mykiss]	Farming	10

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), 2024-04-08

Veronica B. Madsen
Lead auditor

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

Sabrina Bianchini
Management Representative





Letter of Conformance No: 282721-2019-GLOBALGAP-NOR-DNV
Place and date: Vimercate, 2024-04-08

Annex for Letter of Conformance – GGN 4059883847161

Date of issue 2024-04-08

Production Sites

Site name	Address
Osland Genetics / 12178 Bjønnsjøneset Fish groups: BJ - 03-2-11-1-23-22-M4 BJ - 03-2-11-1-23-22-M8 BJ - 03-2-12-1-23-22-M3 BJ - 03-2-22-1-23-22-M1	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 05.883; E 05 49.513
Osland Genetics / 32977 Måren Fish groups: MAA - 08-2-13-1-24-23-M9 OG MAA - 08-2-23-1-24-23-M7 IL	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 09.160; E 06 07.002
Osland Genetics / 11966 Skigelstrand	<i>Saudavegen 5102, 5583 Vikedal, Norway</i> N 59 29.645; E 05 50.800
Osland Genetics / 33677 Torvund	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 08.700; E 05 39.371
Osland Genetics / 12165 Hermansverk	<i>Leikanger, 6863 Leikanger, Norway</i> N 61 11.061; E 6 51.293
Osland Genetics / 18336 Midtneset	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 06.405; E 05 45.413
Osland Genetics / 12180 Osland II	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 04.306; E 5 48.040
Osland Genetics / 23375 Sørevik Fish group: SO - 06-2-22-1-24-23-M5 OG	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 05.958; E 05 43.978
Osland Genetics / 15465 Søreide Fish groups: EI - 05-2-12-1-23-22-M7 OG EI - 05-2-23-1-23-22-M1 OG	<i>Osland Brygge, 5962 Bjordal, Norway</i> N 61 06.323; E 05 51.210



GLOBAL G.A.P. + ADD-ON

NON-GM / "OHNE GENTECHNIK" ADD-ON FOR THE AQUACULTURE AND LIVESTOCK SECTOR Module 2: Farm/Producer

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 FARM	PRODUCTION OF NON-GM / “OHNE GENTECKNIK” LIVESTOCK / FISH FROM AQUACULTURE						
	<i>Control points in this module are applicable to all producers of livestock / fish from aquaculture seeking certification according to the Non-GM Add-on PRODUCTION OF FISH / LIVESTOCK. 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 FARM 1	FACILITY DESCRIPTION						
NON-GM FARM 1.1	Is a specific facility description available that describes the processes of feeding the livestock/fish and does it integrate the possible intake points of GM feed?	A specific production facility description shall be available that describes in detail the processes of feeding the animals. It shall consider all possible intake points of GM feed materials. In case there are different species and categories of livestock and/or aquaculture kept on the same site with different status regarding GM and NON-GM production, the NON-GM species must be defined and allocated in the facility description by individual house/pond. In case GM feed is produced, stored, processed, or fed, a facility block diagram sketch shall be drawn up pointing out all livestock/aquaculture premises including their holding capacities and species kept therein, feed storage areas, and facilities for feed production and feed handling (mixing facilities, equipment storage, feeding installations, etc.) including all facilities that are not located directly at the farmstead.	Major Must		x		Seen procedure 8.4.6 Mottak av för, dated 10.11.23. All feed received shall be labelled Non-GM on both delivery note and label tag Seen procedures "mottak av rogn - settefisk", "mottak av yngel" and "mottak av smolt", describing input of ova, fry and smolt to the sites

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 1.2	Is there an updated organizational diagram available detailing all persons working at the production site and determining who is responsible for the processes of the NON-GM / “Ohne Gentechnik” feeding and production including proxy assignments and which other persons are involved?	An organizational diagram of all persons working at the production site shall be present that determines who is responsible for the processes of the NON-GM / “Ohne Gentechnik” feeding and production including proxy assignments and which other persons are involved and shall undergo appropriate training. The chart shall be updated when personnel joins and leaves the business.	Major Must	x		 	General manager is responsible, and production manager is the substitute
NON-GM FARM 2	RISK ANALYSIS, SELF MONITORING SYSTEM						
NON-GM FARM 2.1	Did the livestock/aquaculture producer perform a risk assessment of the individual on-farm procedures regarding sources of intake and carryover of GM feed materials?	Before agricultural livestock/aquaculture producers are allowed to begin feeding according to the NON-GM / “Ohne Gentechnik” requirements, a risk assessment of the individual on-farm procedures shall be completed and the following sources of intake or cross-contamination must be analyzed: - intake of GM feed - intake by home-grown feed materials - carryover and comingling by a third party - carryover on the farm (e.g. tools, equipment, personnel, etc.) - comingling with livestock/aquaculture species being non-compliant with regulations for GMO-free production (e.g. GM Salmon)	Major Must	x			Seen A3 Sårbarhetsvurdering /Risikovurdering Mattrygghet, dated 20.02.24 Seen Non-GMO risikoanalyse, dated 20.02.24. All delivery notes shall contain the words Non-GM

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 2.2	Has the livestock/aquaculture producer implemented and documented corrective actions based on the risk analyses according to CPCC 2.1?	Detailed measures and corrective actions tailored to the livestock/aquaculture producer in question shall be performed and documented on the basis of the risk analyses according to CPCC 2.1 and on the basis of the identified various sources of carryover, comingling, and contamination. These measures and corrective actions must preclude the possibility of future contamination by and carryover from feed requiring a GMO declaration.	Major Must	x			Seen procedures 13.6 Tilbakekallingsrutiner, dated 11.10.22, and 2.10.2 Avvikende produkter, dated 15.01.21. Fish suspected of not meeting NON-GM requirements is quarantined until they are sure of the situation, and CB is informed immediately

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 2.3	Are the conversion times for NON-GM / “Ohne Gentechnik” livestock/aquaculture production observed and met?	<p>Whenever a livestock/aquaculture producer starts NON-GM / “Ohne Gentechnik” production the conversion times according to ANNEX 1 shall be observed and met.</p> <p>The procedures shall be described accordingly.</p> <p>In case additional animals are purchased by the producer during one grow-out cycle, the minimum conversion feeding periods according to ANNEX 1 must be observed and met. The procedure shall be described and documented accordingly.</p> <p>In case new animals are bought from an owner who has fed the animals in compliance with the NON-GM / “Ohne Gentechnik” feed, this period may be factored into the minimum conversion period, provided there is written confirmation from the previous owner on this. The confirmation must contain the date from which the animals were verifiably and consistently fed with NON-GM feed.</p> <p>N/A if animals are exclusively sourced within the country of production and if within the last two years - for cattle growers: 3 quarters of their lifetime - there is no governmental approval and no use of GM feed in the said country of production based on official regulations/policy.</p>	Major Must	x			<p>12.03.2024 VERMAD CLOSED</p> <p>Due to the benefits of using the specialized broodfish feed from Polarfeed, the company has decided to opt for parallel production with regards to Non-GM, and withdraw site Oslandsurda from the certificate</p> <p>They have used feed from Polarfeed, they are not Non-GM certified. This feed was used at site Oslandsurda, on fish that has been harvested. Fish that has received feed from Polarfeed has not been sold as Non-GM fish. Seen invoice ID 10891, dated 06.11.23, for fish sold from Oslandsurda to Firda Seafood, confirming sale was not labelled Non-GM. Also seen confirmation from Firda Seafood dated 21.02.24 that these batches of fish were not sold to further customers as certified Non-GM</p>

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
		In addition, there shall be written proof by the producer that feed was exclusively sourced from compound feed manufacturers within the same country and that these comply with the requirements of the GLOBALG.A.P. Add-on for NON-GM feed manufacturing.					
NON-GM FARM 2.4	Does the producer have a written self-declaration that he uses exclusively domestically produced NON-GM feed materials for the feeding of his livestock/aquaculture species?	The producer shall have a written self-declaration assuring that he uses exclusively NON-GM feed from domestic production for the feeding of his livestock/aquaculture species. This shall be accompanied by the delivery notes of the supplied seeds for the domestically produced feed and the crop growing documentation. N/A if no domestically grown feed in use.	Major Must	x			Seen statement Non GMO Stamfisk, dated 18.12.23

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 2.5	Does the producer take responsibility to conduct a minimum of one internal self-assessment per year against the GLOBALG.A.P. NON-GM Add-on Standard Module 2 Farm/Producer?	There shall be documented evidence that one internal self-assessment per year has been completed under the responsibility of the producer against the GLOBALG.A.P. NON-GM Add-on Standard Module 2 Farm/Producer. The self-assessments shall include all applicable control points, even if a subcontracted company carries them out. 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			Seen self-assessment dated 20.02.24, signed by general manager
NON-GM FARM 3	TRAINING OF STAFF FOR NON-GM / "OHNE GENTECHNIK" PRODUCTION OF FISH / LIVESTOCK						
NON-GM FARM 3.1	Is there an annual training of all staff members involved in the operating procedures of the NON-GM / "Ohne Gentechnik" production of animals?	There shall be an annual training of all staff members that are involved in the operating procedures related to the production of animals according to the NON-GM / "Ohne Gentechnik" requirements.	Major Must	x			Seen documentation of training in Non-GM for worker 1 dated 20.02.24, worker 2 dated 17.01.24, worker 3 dated 21.02.24, worker 4 dated 19.12.23, worker 5 dated 20.02.24, and worker 6 dated 21.02.24
NON-GM FARM 3.2	Is there a documentation of the annual training on the NON-GM / "Ohne Gentechnik" standard requirements detailing the training date, the training location, the instructor, the content, and the attendees?	The annual training on the NON-GM / "Ohne Gentechnik" standard requirements shall be documented regarding the training date, the location, the instructor, the content, and the attendees.	Major Must	x			Seen documentation of training in Non-GM for worker 1 dated 20.02.24, worker 2 dated 17.01.24, worker 3 dated 21.02.24, worker 4 dated 19.12.23, worker 5 dated 20.02.24, and worker 6 dated 21.02.24

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 3.3	Is there a documented initial training of all new staff members involved in the production of NON-GM livestock/fish from aquaculture?	The initial training of all new staff members involved in the production of NON-GM livestock/fish from aquaculture 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			Seen documentation of plan for training of new staff included in the start training, eg in training document "Opplæringsbevis"
NON-GM FARM 4	RETENTION TIMES OF DOCUMENTATION						
NON-GM FARM 4.1	Are all documents in the context of the labeling of aquaculture/livestock according to NON-GM / "Ohne Gentechnik" retained for at least five years?	All documents in the context of the labeling of aquaculture/livestock according to the requirements for food to be labeled NON-GM / "Ohne Gentechnik" shall be retained for at least five years. During the first five years of production the documents shall be available for the related period of NON-GM / "Ohne Gentechnik" production. At the time of first assessment, these documents must be available according to the conversion times of ANNEX1. These documents shall be: delivery bills, invoices, purchase orders, declarations and specifications of seed, means of production, and the type of feed.	Major Must	x			Seen procedure 2.11 Dokumentering / Lagring av dokumentasjon, dated 21.02.24. Records are kept for at least 5 years
NON-GM FARM 5							

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
TRACEABILITY AND SEGRGATION OF COMMODITY FLOWS							
NON-GM FARM 5.1	Is it possible to trace back within one working day the animals described and labeled with the claim NON-GM / "Ohne Gentechnik" to the farm of production 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 animals described and labeled with the claim NON-GM / "Ohne Gentechnik". Products shall be traceable back to the farm 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		 	Seen procedure 1.10 reklamasjon og tilbaketrekking, dated 18.12.23 Seen withdrawal test dated 06.11.23 for fish sold from Mjølsvik to Seaborn. The test was completed within an hour

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 5.2	<p>Is it ensured at the incoming goods department that all feed that is used for the NON-GM / “Ohne Gentechnik” production meets the requirements for NON-GM feed?</p>	<p>At the incoming goods department it shall be ensured by means of the delivery notes that all feed used for the NON-GM / “Ohne Gentechnik” production shall meet the requirements for NON-GM feed according to the requirements of GLOBALG.A.P. Add-On NON-GM for feed manufacturers.</p> <p>In order to guarantee traceability in the agricultural sector, all delivery bills of feed that is additionally acquired must be examined for the completeness of the information as provided and must be filed chronologically.</p> <p>In case any mobile mixing or grinding facilities are in use, a confirmation is needed stating that these do meet the requirements, and a record of the flushes of the facilities shall be present.</p> <p>In case any home-grown crops are used for feeding livestock/aquaculture, there shall be documentary evidence that the seeds and/or seedstocks are NON-GM.</p>	Major Must	x			<p>12.03.2024 VERMAD CLOSED</p> <p>Due to the health benefits of using the specialized broodfish feed from Polarfeed, the company has decided to opt for parallel production with regards to Non-GM, and withdraw site Oslandsurda from the certificate.</p> <p>Seen confirmation from Bureau Veritas that Biomar is indeed certified for Non-GM, and that there is a mistake in the GG database</p> <p>They have used feed from Polarfeed, they are not Non-GM certified. Polarfeed has been used for maintenance feeding of broodfish and broodfish candidates. Broodfish are destroyed after breeding, but broodfish candidates not used for breeding are harvested. Harvested broodfish candidates have not been sold as Non-GM certified. Seen invoice ID 10891, dated 06.11.23, for fish sold from Oslandsurda to Firda Seafood, confirming sale was not labelled Non-GM. Also seen confirmation from Firda Seafood dated 21.02.24 that these batches of fish were not sold to further customers as certified Non-GM</p> <p>They have also used feed from Biomar. Seen pdf certificate for Non-GM valid to 20.08.24 by Bureau Veritas. However in the GG database Biomar is listed</p>

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 5.3	Are the receipt, the storage, the internal transport, and the supply to animals of NON-GM feed segregated from GM feed?	<p>The receipt, the storage, the internal transport, and the supply to animals of NON-GM feed shall be segregated from GM feed.</p> <p>Simultaneous storage at the producer's facilities of NON-GM and GM feed is only possible if permanent physical segregation of these feeds is in place.</p> <p>N/A in case the commercial cultivation and import of GMOs is prohibited by law in the country of production.</p> <p>N/A in case NON-GM feed is exclusively in use.</p>	Major Must	x			Feed from Polarfeed stored in separate bags and separate sites. Seen statement from Polarfeed dated 02.01.24, stating that no GM raw material is used in production
NON-GM FARM 5.4	Is the simultaneous storage of GM feed and its feeding to the same category of aquaculture livestock species on the same production site as the NON-GM production prohibited?	<p>The simultaneous storage of GM feed and its feeding to the same category of aquaculture/livestock on the same production site as the NON-GM production shall be prohibited.</p> <p>N/A if no parallel production with NON-GM feed and GM feed at the same site of the aquaculture/livestock species producer.</p>	Major Must	x			While use of GM rapeseed oil is technically permitted in Norway, it is still years away from actually being used in production of compound fish feed. Seen email from Skretting, dated 20.02.24, explaining that permission to use GM rapeseed oil has been given, but due to market situation in Norway there is still an extensive process to be completed before production using this oil can begin. For this reason, even feed that is not certified as being Non-GM does not contain any GM raw material

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NON-GM FARM 5.5	Do operators of mobile grinding and/or mixing facilities that grind and/or mix GM feed as well as NON-GM feed take appropriate measures to prevent carryover of GM feed?	<p>The operators of mobile grinding and/or mixing facilities that grind and/or mix GM feed as well as NON-GM- feed shall take appropriate measures to prevent carryover of GM feed to NON-GM feed. The measures, esp. the flushing batches, shall be documented by the operators. One annual test of mixed finished feed materials for GMO materials shall be performed. Analysis for GMO content shall be performed in an ISO 17025-accredited laboratory and shall follow the procedures for GMO testing as outlined in ANNEX 2 of Module1 of this Add-on. The results shall be available.</p> <p>N/A if mobile grinding and/or mixing facility can prove by evidence that it operates exclusively for NON-GM feed.</p> <p>N/A if no mobile grinding or mixing facility in use.</p>	Major Must	x			No mobile grinding and / or mixing facility in use

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 5.6	Do producers with their own stationary grinding and/or mixing facilities (home-mixers) using both GM feed and NON-GM feed and mixing it in the same device, take measures to prevent the carryover of GM feed, and is the efficiency of the measures examined in one annual analysis?	Home-mixers operating their own stationary grinding and/or mixing facilities using both GM labeled and GM unlabeled feed and performing the mixing with the same facility, shall take measures to prevent carryover of GM feed to NON-GM feed. The measures shall be recorded, and their efficiency shall be examined by one annual analysis. The analysis must be commissioned by the home-mixer and the results must be present. N/A if no stationary grinding or mixing facility in use.	Major Must			x	No mobile grinding and / or mixing facility in use
NON-GM FARM 6	DECLARATION ON DELIVERY NOTES AND INVOICES FOR NON-GM PRODUCTS AND SYSTEM FOR CRISIS MANAGEMENT						
NON-GM FARM 6.1	Is there a statement on the delivery notes and on the invoices declaring that the supplied livestock/aquaculture products are 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 livestock/aquaculture products are suitable for the production of food labeled NON-GM / "Ohne Gentechnik".	Major Must	x			Seen delivery note from Skretting, for feed delivered to Skigelstrand 13.02.24. Feed is stated as being suitable for production of food labelled Non-GM/Ohne Gentechnik

N°	Control Points	Compliance Criteria	Level	Yes	No	N/A	Justification
NON-GM FARM 6.2	Is there a documented system in place concerning the fault correction and the labeling or blocking of non-compliant products before the dispatch of these products in case of analyses results with GM content above 0.9% or other findings concerning the non-secured conformity with the NON-GM / "Ohne Gentechnik" requirements?	In case of analysis results of GM content above 0.9% or other findings concerning the non-secured conformity with the NON-GM / "Ohne Gentechnik" requirements there shall be a documented system in place concerning the fault treatment and labeling the blocking of non-compliant products before the dispatch of such products from the farm.	Major Must	x			Handling of contaminated products are included in the risk assessment, eg. The company has stated that if products are not in line with requirements for NON GM products the products has to be separated and CB has to be informed.