

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
C653964

Date of Assessment
2023-12-07

Valid
from 2023-12-28 to 2024-12-27

Registration No.: DNV
CERT26392023GGNORACCREDIA

GGN Number: 4063651770179

Issued to

Ocean Farming AS

Industriveien 51, 7266 Kverva

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 for the below mentioned product(s)/product scope..

Product (Scope)	Process description	Number of (Production) Sites
Atlantic salmon [<i>Salmo salar</i>]	Farming	1

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), 2024-01-19

Thomas Kloster-Jensen
Lead auditor



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



Sabrina Bianchini
Management Representative

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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 / 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 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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		
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: <ul style="list-style-type: none"> - 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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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> <p>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.</p>	Major Must			NA

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		
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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		
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	Yes		
NON-GM FARM 4	RETENTION TIMES OF DOCUMENTATION					

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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?	<p>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.</p> <p>At the time of first assessment, these documents must be available according to the conversion times of ANNEX1.</p> <p>These documents shall be: delivery bills, invoices, purchase orders, declarations and specifications of seed, means of production, and the type of feed.</p>	Major Must	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
NON-GM FARM 5	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	Yes		

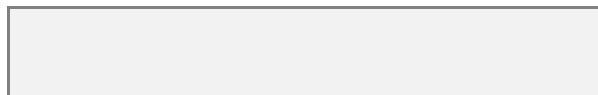
Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
NON-GM FARM 5.2	Is it ensured at the incoming goods department that all feed that is used for the NON-GM / “Ohne Gentechnik” production meets the requirements for NON-GM feed?	<p>At the incoming goods department it shall be ensured by means of the 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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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			NA
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			NA

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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			NA
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			NA

Nº	Control Points	Compliance Criteria	Level	Yes	No	N/A
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	Yes		



*FISH / LIVESTOCK located and operating in EU
n is equivalent to these EU REGULATIONS or to*



Seen procedure "Fôrvalg Matfisk" 16.08.2023 regarding types of feed available for use from two Norwegian suppliers.
Seen procedure "Mottak, kontroll og reklamasjoner" 15.09.2021 regarding reception, control and claims on feed. States feed shall be traceable to GLOBALG.A.P., Non-GM, ASC.
Company management decides supplier, and feed group with two persons recommends feed products from these suppliers. Sites use feed on the basis of these conditions.
No own production of feed. Feed delivered in bulk by boat from approved suppliers and stored in silos on farms.

Seen updated organization charts/lists in EQS.
Company management decides supplier, and feed group with two persons recommends feed products from these suppliers. Sites use feed on the basis of these conditions.

Seen risk assessments for feed and ova
"Matsvindelanalyse Non-GM" 15.12.2022, states certified and serious suppliers are used (low risk).

Risk assessments states low risk, no corrective actions needed.



Farms are certified. Purchase of feed, ova and smolt from suppliers within Norway. GM is not allowed to use in Norway.

Seen statement 07.06.2023 regarding no use of GMO

Self-assessment performed 15.09.2023, no NC's.

Annual training for relevant quality staff members performed and recorded in EQS within the last year. Training module has implementation support (read and verify function), e.g. Training for 16 persons in quality dep. and 2 in feed dep. last 12 months.

Powerpoint training documentation distributed to all relevant personnell involved in operating procedures for desicions of purchase of feed.
Powerpoint training documentation distributed to all relevant personnell involved in operating procedures for desicions of purchase of feed.



Minimum 5 years according to procedure
"Implementering av GlobalGAP standarden i Salmar"
03.04.2023



Full traceability with FishTalk and EQS, additional feed records in feed suppliers detailed database. Traceback within one day possible, seen traceability procedures "Sporbarhet" 20.06.2023 (production from ova to market), "Mottak av smolt" 01.06.2023 (reception of fish), "Levering av slaktefisk" 28.06.2023 (delivery of fish), etc.

GMO is not allowed used in Norwegian salmon farming feed nor in the farmed species.
Feed supplier EWOS:
EWOS statement on GMO free raw materials
03.01.2023.
EWOS GG CFM certified and Non-GM module 1
Seen procedure "Fôrvalg Matfisk" 16.08.2023
regarding types of feed available for use from two
Norwegian suppliers.
Seen procedure "Mottak, kontroll og reklamasjoner"
15.09.2021 regarding reception, control and claims on
feed. States feed shall be traceable to
GLOBALG.A.P., Non-GM, ASC.
Company management decides supplier, and feed
group with two persons recommends feed products
from these suppliers. Sites use feed on the basis of
these conditions.

<p>No GMO feeds used nor allowed in country. Feed supplier EWOS: EWOS statement on GMO free raw materials 03.01.2023. EWOS GG CFM certified and Non-GM module 1 No production of GM products.</p>
<p>Only one kind of feed supplied. No production of GM products.</p>

No grinding and/or mixing facilities.

No grinding and/or mixing facilities. Purchases salmon compound feed in Norway, where GMO in feed are prohibited by law.
Feed supplier EWOS:
EWOS statement on GMO free raw materials
03.01.2023.
EWOS GG CFM certified and Non-GM module 1

GM is not allowed in Norway.
Feed supplier EWOS:
EWOS statement on GMO free raw materials
03.01.2023.
EWOS GG CFM certified and Non-GM module 1
No Mon-GM certified products sold



Procedure for withdrawal "Tilbaketrekking og tilbakekalling" 20.06.2023 relevant for evt non-secured conformity with the non-GM requirements.