



Annex 9.2 Gate-Keeping regulation

If **compound feed** is purchased directly from a producer, the producer has to be eligible to deliver into the QS scheme.

Nevertheless, it may be necessary, particularly when entering new markets, to procure goods from non-certified producers or traders for a defined period. Therefore, the following possibilities exist:

- Gate-Keeping for non-certified producers of additives and premixtures
- Gate-keeping for non-certified feed material producers
- Gate-Keeping for non-certified traders of agricultural primary products

Generally:

- Gate-Keeping for suppliers, which are certified according to a standard recognized by QS, is not possible. Which standards are currently recognized by QS for which activities, can be seen in ⇒ Annex 9.1.
- Gate-Keepers must deposit all raw materials and suppliers, for which they act as Gate-Keepers, in the QS database at the location information and must always keep them up to date.

Gate-keeping for non-certified producers of additives and premixtures

If a feed company wants to purchase additives or premixes directly from producers which are not certified (according to QS or a standard recognized by QS), this is possible under the following conditions:

- The supplier (producer of additive/premixture) is integrated into the supplier evaluation.
- If the supplier commissions the transport, requirements have to be defined for the transport, which delivers the additives/premixtures. For transport of bulk products, it must at least be required that the last three freights and the conducted cleaning regimes are proved and that they are corresponding to the ICRT-requirements. If the gate-keeper commissions the transport himself, certified transport companies have to be chosen.
- The additive/premixture is included into the feed monitoring and gate-keeping is conducted separately for **every non-certified producer**. For this purpose, a site-specific control must be submitted to QS which has to be released by QS. Therefore, the form "Request for a Site-Specific Control Plan" can be used (see www.q-s.de). The sample related data and the analysis results must be entered into the software platform feed monitoring and must be marked with the sample type "gate-keeping".

Gate-keeping for non-certified feed material producers

If a feed company wishes to purchase feed material from producers which are not certified (according to QS or a standard recognized by QS), this is possible under the following conditions:

- The producer is integrated into the supplier evaluation.
- If the supplier commissions the transport, requirements have to be defined for the transport, which delivers the feed materials. For transport of bulk products, it must at least be required that the last three freights and the conducted cleaning regimes are proved and that they are corresponding to the ICRT-requirements. If the gate-keeper commissions the transport himself, certified transport companies have to be chosen.
- Each delivered batch has to be sampled and the monitoring for undesired substances has to be conducted.

Transport	Sampling	Analysis	Parameter
Seagoing vessel ^{1, 2}	1 sample per hold	Each sample	According to Guideline Feed Monitoring
Inland waterway vessel or coaster	1 sample per hold	Each sample	According to Guideline Feed Monitoring
Train	1 sample per train	Each sample	According to Guideline Feed Monitoring
Truck ³	1 sample per truck	1 per batch (max. 500 t)	According to Guideline Feed Monitoring

¹ For seagoing vessels sampling per hold is not always possible. In this case the gate-keeper can alternatively do 1 analysis per 8000 tons.

² Containers at seagoing vessels (ca. 25-27 t) are treated just as trucks

³ Pooling of several lorry supplies, which belong to one batch, is possible (max. 500 t).

- The sample taking has to be done according to the requirements of the Guideline Feed Monitoring.
- The parameters which have to be analysed have to follow the corresponding control plans for feed material producers in the Guideline Feed Monitoring. For feed materials, for which there is no sector-specific control plan available in the guideline, a site-specific control plan has to be submitted to QS and approved by QS. Therefore the "Request for a Site-Specific Control Plan" can be used (see www.q-s.de).
- The sample related data and the analysis results must be entered into the feed monitoring database and must be marked with the sample type "gate-keeping".

Limitations to this regulation for certain origins or products:

For feed material producers in the following **countries** there is no gate-keeping possible:

- Germany
- Belgium
- Luxembourg
- Netherlands
- Great Britain
- Austria

This means that feed material producers from the countries listed above must be certified in accordance with QS or a QS-recognised standard. Gate-keeping is not permitted for goods from these countries.

For the following **products** gate-keeping is also not possible:

- Fatty acids from chemical refining
- Fatty acid distillates from physical refining
- Salts from fatty acids
- Mono- and diglycerides of fatty acids
- Fish oil (incl. fish oil refined, hydrogenized)
- Raw coconut oil
- Raw cacao butter

This means that the above-mentioned feed materials may only be purchased from producers which are certified and eligible to deliver into the QS scheme because they have been defined as risky products within the QS scheme. Gate-keeping for these products is not permitted. Nevertheless, if a producer or trader can prove that the supply of one of the above-mentioned feed materials is not possible from a certified resource, he can ask for a **special release** at the QS office. Therefore, the following regulation is valid:

- The company has to argue in written form that there is no certified producer as supplier available. Pure economic reasons are not acceptable.
- The supplier is not located in one of the above-mentioned countries.
- The supplier has to be integrated into the supplier evaluation.
- For the gate-keeping there has to be established a control plan for each non-certified producer and every product. The control plan has to be applied for at QS (form "Request for a Site-Specific Control Plan", see www.q-s.de). Therefore the requirements of the Guideline Feed Monitoring are relevant and, depending on the product and supplier, additional requirements, which are defined in written form by QS. The control plan has to be released by QS. In case of approval the QS scheme participant will receive a written confirmation from QS.



- The data accompanying the samples and the analysis results have to be entered into the feed monitoring database and must be marked with the sample type "gate-keeping".
- QS gives a temporarily restricted approval to the gate-keeping (in general for one year). After that the producer has to get certified or the gate-keeper has to choose another resource.

Gate-Keeping for non-certified traders, when purchasing cereals, (oil) seeds or legumes

If a feed company wants to purchase cereals, (oil) seeds or legumes as unprocessed agricultural primary products via a trader, which is not certified according to QS or a standard recognized by QS, this is possible under the following conditions:

- The trader is integrated into the supplier evaluation.
- There are requirements defined for the transport, which delivers the cereals, (oil) seeds or legumes. For transport of bulk products, it must at least be required that the last three freights and the conducted cleaning regimes are proved and that they are corresponding to the ICRT-requirements. If the gate-keeper commissions the transport himself, certified transport companies have to be chosen.
- The Gate-Keeper deposits all information on Gate-Keeping in the QS database.
- Each delivered batch has to be sampled and the monitoring for undesired substances has to be conducted.

Transport	Sampling	Analysis	Parameter
Seagoing vessel ^{1, 2}	1 sample per hold	Each sample	According to Guideline Feed Monitoring
Inland waterway vessel or coaster	1 sample per hold	Each sample	According to Guideline Feed Monitoring
Train	1 sample per train	Each sample	According to Guideline Feed Monitoring
Truck ³	1 sample per truck	1 per batch (max. 500 t)	According to Guideline Feed Monitoring

¹: For seagoing vessels sampling per hold is not always possible. In this case the gate-keeper can alternatively do 1 analysis per 8000 tons. For seagoing vessels, sampling must be carried out by an independent sampler (in the port of loading or unloading).

²: Containers at seagoing vessels (ca. 25-27 t) are treated just as trucks

³: Pooling of several lorry supplies, which belong to one batch, is possible (max. 500 t).

- The sample taking has to be done according to the requirements of the Guideline Feed Monitoring.
- The parameters which have to be analysed have to follow the corresponding control plans for feed material producers in the Guideline Feed Monitoring.
- The sample related data and the analysis results must be entered into the feed monitoring database.
- In case the gate-keeper has a written statement from the drying company that proves, that
 - natural gas is used, or
 - indirect drying is applied,

the batch related monitoring can be reduced (in accordance with HACCP respectively guideline feed monitoring).

The whole batch must be kept segregated from the other batches, unless it is tested and approved.

- The data accompanying the samples and the analysis results have to be entered into the feed monitoring database and must be marked with the sample type "gate-keeping".

Limitations to this regulation for certain origins

For traders in the following **countries** there is no gate-keeping possible:

- | | | |
|---------------|-----------------|--------------|
| ■ Germany | ■ Belgium | ■ Luxembourg |
| ■ Netherlands | ■ Great Britain | ■ Austria |
| ■ Denmark | ■ Ireland | ■ Greece |
| ■ Canada | | |

This means that traders from the countries listed above must be certified in accordance with QS or a QS-recognised standard. Gate-keeping is not permitted for goods from these countries.



Gate-keeping for products from the intervention

If a feed company wants to purchase products from the intervention, this is possible under the following conditions:

- The storage facility is integrated into the HACCP concept.
- If the gate-keeper commissions the transport himself, certified transport companies have to be chosen. If the transport is not commissioned by the gate-keeper, requirements have to be defined for the transport company, which delivers the products out of the intervention. For transport of bulk products, it must at least be required that the last three freights and the conducted cleaning regimes are proved and that they are corresponding to the ICRT-requirements.
- The products out of the intervention are included into the feed monitoring. For this purpose, a site-specific control must be submitted to QS which has to be released by QS. Therefore, the form "Request for a Site-Specific Control Plan" can be used (see www.q-s.de). The sample related data and the analysis results must be entered into the software platform feed monitoring and must be marked with the sample type "gate-keeping".

Revision information Version 01.01.2020

Criteria/Requirement	Change	Date of change
<p>„Gate-Keeping for non-certified feed material producers “</p> <p>and</p> <p>„Gate-Keeping for non-certified traders, when purchasing cereals, (oil) seeds or legumes“</p>	<p>New footnote (2): Containers at seagoing vessels (ca. 25-27 t) are treated just as trucks</p>	<p>01.01.2020</p>