Annex 9.7 Additional control plans

Additional control plan Aflatoxin B1

Fundamentals

The additional control plan must be adhered additionally to the annual analyses which are required within the QS scheme according to the **Guideline Feed Monitoring**.

Scope

The additional control plan has to be followed by

- compound feed producers, scope 71
- feed material producers, scope 72
- small scale feed material producers, scope 73
- Private labeler, scope 74
- traders (including delivery trading without storage), scope 76

Responsibilities

Each QS certified company, which receives maize or processed maize (feed material), has to fulfil this additional control plan. If the supplier is certified by QS or a QS recognized standard and therefor has to fullfill the requirements in place for the respective standard, this additional control plan is not applicable for the purchaser.

In contrast to the obligation to take part in the QS monitoring also delivery traders (traders without storage capacity) have to adhere this additional control plan. For example: A delivery trader purchasing maize to a QS certified compound feed producer. The maize is directly delivered from the country of cultivation to the compound feed producer. The trader needs to apply this additional control plan and depending on the classification of risk needs to forward the analysis result to the compound feed producer.

Requirements

Countries of cultivation

The countries of cultivation are classified in different categories (high, medium and low risk). The classification is based on a potential risk by weather conditions in the respective countries, as well as former analysis results and notifications from the RASFF. A reclassification of the countries in the different categories will be made as soon as a certain number of analyses is deposited in the software-platform and can be evaluated by the scheme owner. Data, which are not inserted in the software-platform cannot be used for evaluation and reclassification. Other information like RASFF notifications, information about weather/harvest conditions can also be used for reclassification.

Risk Classification

Table 1: Risk classification for countries of cultivation

High	Medium	Low
Brazil India Italy Romania Russia	all other countries which are not mentioned under 'high' or 'low'	Austria Belgium Canada Czech Republic Denmark Estland Finland France Germany Latvia Lithuania Iceland Ireland Luxembourg the Netherlands Norway Poland Sweden UK Ukraine

If the country of cultivation is not known, classification as high risk is applicable.

In addition to the classification made by the standard owner, the precautionary principle always prevails. This means that a company always has to consider the possible risk of Afaltoxin B1 in maize or processed maize from a country of cultivation, as well as the storage conditions until receiving the maize or processed maize.

Reclassification

The reclassification is done by the standard owner and in addition to that in cooperation with the standard owners recognized by QS. It is based on the following criteria:

Table 2: Criteria for Reclassification of a country of cultivation

Risk level by country of cultivation	Criteria for defining the risk level
High	> 1% of the available analysis results within the previous evaluation period > 20ppb or > 10% of the available analysis results between > 10ppb and ≤ 20ppb
Medium	Percentages of analysis results that are not mentioned under the risk levels 'High' or 'Low' fall under the risk level 'Medium'
Low	< 1% of the available analysis results between > 5ppb and ≤ 10ppb and > 90% of available analysis results < 2ppb and other available analysis results ≤ 5ppb

Up- and downgrading:

- For upgrading a country of cultivation to a higher risk level, the number of samples to be tested is at least 1.
- For downgrading a country of cultivation to a lower risk level, the number of samples to be tested is at least 20.

The reclassification will result in a revised additional control plan. The scheme participants will be informed by QS about the revised document.

Sampling

For high and medium risk the sampling has to be done in accordance with the **Commission regulation (EU) No 691/2013** amending **Regulation (EC) No 152/2009** as regards methods of sampling and analysis. For low risk the sampling has to be done in accordance with the **Guideline Feed Monitoring**.

In the following table an overview is given differentiated by risk classification as well as by means of transport about the requirements concerning:

- Samples per batch
- Location of sampling
- Sampler

Table 3: Overview of requirements for sampling

Means of transport	**Require-ments**	**Risk classification**		
		High	**Medium**	**Low**
Seagoing vessel	**Samples per batch**	1 sample per hold	1 sample per hold	Risk-oriented according to guideline feed monitoring on HACCP basis
	Location of sampling	Country of cultivation (port of loading)	port of loading or port of unloading	port of loading or port of unloading
	Sampler	Sampler of an independent superintendent organization accredited according to ISO 17020 or ISO 9001 or GAFTA certification	Sampler of an independent superintendent organization accredited according to ISO 17020 or ISO 9001 or GAFTA certification	According to guideline feed monitoring
All other transportation	**Samples per batch**	**Truck:** 1 sample per batch (max. 1.000t)[1]	**Truck:** 1 sample per batch (max. 2.000t) [1]	Risk-oriented according to guideline feed monitoring on HACCP basis
		Train: 1 sample per batch (max. block train)	**Train:** 1 sample per batch (max. block train)	
		Inland waterway vessel or coaster: 1 sample per inland waterway vessel or coaster	**Inland waterway vessel or coaster:** 1 sample per inland waterway vessel or coaster	

Means of transport	Require-ments	Risk classification		
	Location of sampling	**Truck:** Country of cultivation or destination	**Truck:** Country of cultivation or destination	No specification
		Train and Inland waterway vessel or coaster: Country of cultivation (place of loading)	**Train and Inland waterway vessel or coaster:** Country of cultivation (place of loading)	
	Sampler	According to guideline feed monitoring	According to guideline feed monitoring	According to guideline feed monitoring

[1] One sample has to be analysed per lorry; pooling of several lorry supplies, which belong to one batch, is possible (max. 1.000 t or 2.000 t)

The sample to be analyzed must be taken from one batch of the same origin (country of cultivation). Two or more different origins cannot be mixed. A batch (according to **Regulation (EU) 767/2009**) means an identifiable quantity of feed determined to have common characteristics, such as origin, variety, type of packaging, packer, consignor or labelling, and, in the case of a production process, a unit of production from a single plant using uniform production parameters or a number of such units, when produced in continuous order and stored together.

Feed material producers which process maize are also allowed to conduct the analysis exclusively in the final products.

In case the sampling dates back more than 3 months a new sampling is required.

If the whole batch in the warehouse is not accessible for sampling, a sampling plan should be made and documented, that covers the accessible part of the batch. The part of the batch that has not yet been sampled and tested, should be monitored once it´s possible and safe to get access.

In case of stored batches and reanalysis after 3 months, the highest measured Aflatoxin B1 value (from all sampling moments) is leading since it is not obvious that Aflatoxin B1 content could decrease over time. All analysis results applicable for the batch (also the expired ones) must accompany the batch.

Analysis and Handling of analysis results

The analysis of samples has to be done in accordance with the requirements described in the **Guideline Feed Monitoring**. However, depending on the risk classification other requirements for analysis of the sample might be allowed.

In the following table an overview is given differentiated by risk classification about the requirements concerning:

- lab analysis
- data entry
- analysis result

The requirements are valid for all means of transport.

Table 4: Overview of requirements for analysis

Require-ments on:	Risk classification		
	High	**Medium**	**Low**
lab analysis	According to guideline feed monitoring		
data entry	According to guideline feed monitoring		
analysis result	Available before processing or sale; must be forwarded to the customer (positive release)	Available before processing or sale; must be forwarded to the customer (positive release)	Must be forwarded to the customer on request[1]

[1] If the particular batch was not sampled, no analysis result must be available for the customer.

For Maize and processed maize, the analysis results have to be attached to the batch (for high and medium risk) and have to be related clearly to the batch.

Exceeding of limits or guidance values

In the case of an exceedance of limit values (exceedance of legal maximum value, action threshold) or exceedance of QS guidance value (for example for products, which are meant for feeding dairy cattle), it has to be proceeded according to the guideline feed sector, chapter *2.1.4 Incident and crisis management* as well as chapter *2.8.4 Control of faulty products* and QS has to be informed immediately. Also the costumer of the goods (client) has to be informed in the case of an exceedance of a limit value immediately.

Recognition of other protocols/additional control plans

QS recognizes the protocols/additional control plans of the following standard owners:

- GMP+ International
- Ovocom
- AIC
- EFISC (processed maize)
- COCERAL

Recognizing the protocols/additional control plans means that the QS-company receiving products (from the above mentioned standards) falling under this additional control plan does not have to apply this additional control plan additionally. The QS-company needs the analysis result (high and medium risk classification).