



## FEMAS Sector Note No. 16 – Gatekeeping

These Sector Notes apply to businesses that include within their scope of activity the role of Gatekeeping, as described in Section 3 of the FEMAS Scheme Rules, incorporated into the FEMAS Standard 2019.

These Notes are not exhaustive and are intended to assist in the application of the corresponding requirements of the FEMAS Standard and are not to be considered in isolation.

Please note that additional FEMAS Sector Notes may also apply, depending on the Sector and activities of the Participant.

**Section 1** of these Sector Notes includes definitions of specific relevance to this sector.

**Section 2** of these Sector Notes explains the application process and requirements

**Section 3** of these Sector Notes includes those additional requirements of the FEMAS Scheme specific to this sector and with which Participants **must** comply in order to achieve certification under the FEMAS Scheme.

**Section 4** of these Sector Notes includes additional guidance (shown in italics) specific to this sector, which will assist Participants in interpreting the FEMAS Standard for their sector.

### 1 Definitions

<b>Gatekeeper</b>	A Participant who sources a feed from a supplier not assured against a scheme recognised by AIC and takes responsibility for the safety and suitability of the feed before it enters into the assured supply chain.
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## **2 Application**

### **Stage 1**

#### **Overview**

Application must be made to the Certification body for any new FEMAS Applicants wishing to operate under the Gatekeeper rules. Application must also be made to the Certification Body for the addition of other feeds or suppliers to be included in an existing FEMAS Gatekeeper's schedule of approved products and suppliers.

On receipt of the application form, the Certification Body will acknowledge receipt and pass on the application to the Gatekeeper Review Group who will consider the application and determine the next steps in the gatekeeper application. The Certification Body will be informed of the Gatekeeper Review Group decision and pass this information to the FEMAS Applicant / Participant. The Certification Body will provide an initial response to the FEMAS Applicant / Participant within two weeks.

The members of the Gatekeeper Review Group include:

FEMAS Working Group Chair  
UFAS Working Group Chair  
AIC Technical Manager  
Certification Body Manager  
Other industry representatives as required

Approval by the Gatekeeper Review Group enables the Certification Body to commence the certification or scope extension process.

#### **Making An Application**

The level of information submitted should be as detailed as possible and provided using the Gatekeeping application form shown in Annex 1 (also available on the AIC website).

The minimum information and evidence required to be submitted as part of an application to be considered by the Gatekeeper Review Group includes the following:

1. Details of the entry for any feed ingredient in the EU Catalogue of Feed Materials or the EU Register of Feed Additives, confirming the name, legal status and entry / approval number
2. If the feed ingredient is not already listed, the output from the FEFANA feed classification tool must be provided to confirm the categorisation of the product: <http://www.fefana.org/ClassTool/>
3. If the FEFANA feed classification tool defines the product as a Feed Material, evidence must be provided that the product has been notified to the Feed Materials Register: <https://feedmaterialsregister.eu/register>

4. Details of the source and supply chain through which the product has travelled.
5. The rationale for the product being considered for Gatekeeping.
6. The estimated quantity of product to be traded on an annual basis.
7. Output from the FEMAS Calculator
8. Additional details to support the application as detailed on the Gatekeeper Application Form shown in Annex 1.

### **Criteria for Application Decision by the Gatekeeper Review Group**

The Gatekeeper Review Group will consider the level of information provided on the source and supply chain through which the product has travelled to determine two key criteria:

1. Can FEMAS Gatekeeping deliver the proposed product safely?
2. Can the rationale for Gatekeeping be supported?

### **Gatekeeper Review Group Decision**

The decision of the Gatekeeper Review Group will be one of the following:

- Acceptance for the application to proceed
- Acceptance for the application to proceed subject to restrictions (e.g. time limited)
- Request for more information (to be provided within 30 days of request).
- Refusal to accept the application.

The decision of the Gatekeeper Review Group will be passed to the Certification Body who will inform the FEMAS Participant / Applicant.

Where additional information is not received within 30 days, the application will be refused.

If an application is refused, the FEMAS Participant / Applicant will be informed of the reason for refusal. In the event of refusal, the FEMAS Participant / Applicant may submit a new Gatekeeper Application for the same product if circumstances change or a revised Application is warranted.

## **Stage 2**

### **Audit**

Following acceptance for an application to proceed, the certification process (as described in the FEMAS Scheme Rules and Standard) will be followed by the Certification Body.

For current certificated businesses who are seeking approval for a new product or supplier the audit may be conducted as a desk top review, subject to the Certification Body's discretion.

### **Maintenance of approved product list / database**

Upon approval, The FEMAS Participant must provide to the Certification Body an updated list / database of the feed covered by the FEMAS Gatekeeper requirements so that the certification scope and approved product list can be updated. A feed may not be traded under FEMAS Gatekeeper rules until the certificate scope and approved product list is updated by the Certification Body.

### 3 Additional Sector-Specific Requirements

<b>A 1.2</b>	<b>Scheme and Legislative Requirements</b>	Any Participant within the FEMAS Scheme fulfilling a Gatekeeper role for feed products entering the Feed Supply Chain, must ensure that products supplied meet <b>all</b> FEMAS Scheme requirements, whether due to controls put in place by the supplier, the Participant or both parties in combination.
<b>D 3.1</b>	<b>Approval of Suppliers of Non-Assured Feed (Gatekeeper)</b>	<p>The FEMAS Participant must advise the Certification Body of any amendments to the list / database of feed covered by the FEMAS Gatekeeper requirements, including those products no longer required.</p> <p>A feed may not be traded under FEMAS certification until the certificate scope and approved product list is updated by the Certification Body.</p>
<b>D 3.2</b>	<b>Approval of Suppliers of Non-Assured Feed (Gatekeeper)</b>	All products included on the approved product list held by the Certification Body must continue to be subject to all the requirements of the FEMAS Standard, regardless of the volumes traded.
<b>D 3.5</b>	<b>Approval of Suppliers of Non-Assured Feed (Gatekeeper)</b>	The Participant must be able to demonstrate that they have sufficient knowledge and information from the non-assured supplier to confirm all applicable requirements of the current FEMAS standard and any relevant Sector Notes are being achieved. The information provided in the Gatekeeper Application Form will not in isolation be sufficient to evidence this.
<b>F3.1</b>	<b>Labelling</b>	Feed products produced from Genetically Modified crops must be labelled in accordance with any Regulatory requirements applicable in the countries where they are sold.

#### 4 Sector-Specific Guidance

<b>B1</b>	<b>HACCP and Feed Safety Risk Assessment</b>	<i>Participants may take into account any effective HACCP programmes already put in place by supplying companies but should confirm that all likely feed safety risks have been considered and mitigated at each step of the supply chain.</i>
<b>B1.3</b>	<b>HACCP and Feed Safety Risk Assessment</b>	<i>When establishing the FEMAS Team, the Participant should consider the merits of including representatives from supplying companies.</i>
<b>B2.1</b>	<b>Documents and Records</b>	<i>Participants may take into account the documents and records held by supplying companies but should confirm that any such documents or records upon which they rely for compliance with the FEMAS Scheme are accurate, accessible and can be made available promptly.</i>
<b>D 3.5</b>	<b>Approval of Suppliers of Non-Assured Feed</b>	<i>To assist Participants in ensuring that FEMAS requirements are being met, the FEMAS checklist is available in Word format on the AIC website. Other documents may be used, however the level of information gathered should be sufficient to satisfy all applicable requirements of the FEMAS standard.</i>
<b>E1.1</b>	<b>Selection and Approval of Suppliers of Subcontracted Services</b>	<i>Participants are reminded that for products where the Participant is acting as the Gatekeeper, no further screening, cleaning, re-packaging, de-packaging or any other processing is permitted before it enters into the assured supply chain. Where such processing does occur, full FEMAS certification will be required.</i>
<b>I 1.1</b>	<b>Sampling and Analysis Schedules</b>	<i>Participants may take into account the samples taken and held by supplying companies but should confirm that any samples upon which they rely for compliance with the FEMAS Scheme are representative, accessible and can be made available promptly.</i>
<b>I 5</b>	<b>Analysis</b>	<i>Participants may take into account the analysis undertaken by supplying companies but should confirm that any analysis upon which they rely for compliance with the FEMAS Scheme has been conducted by suitably qualified laboratories using appropriate methodology. Any results from such analysis should be representative and promptly available.</i>

## Annex 1 - Gatekeeping Application Form

This form is available in Word format on the AIC website

FEMAS Participant / Applicant Company Name	
IF a FEMAS Participant, FEMAS ID number	
FEMAS Participant / Applicant Contact name	
FEMAS Participant / Applicant Contact email address	
Date of Submission	
Please confirm if there is a date when it is hoped certification will be complete	
Feed Material / Additive name	
Legal category of material / reference number	
FEFANA feed classification tool output attached? (where relevant)	
Supplier name and address	
Source and Country of origin	
Rationale for gatekeeping	
Product specification including packaging / bulk delivery format	
Details of steps within the supply chain (a flow chart would assist this)	

Estimated quantity to be traded during a 12-month period	
Method of supplier approval e.g. Questionnaire / Supplier Audit	
Certifications held by supplier and / or source	
Please provide an overview of the production process (a process flow chart would assist this).	
Proposed analysis based on FEMAS Calculator results	
Please provide an overview of any transport and storage in the proposed supply chain.	
Please supply any further information and evidence that will support your application. You may include appended files.	