



## **GMO GUARD CERTIFICATION PROCEDURES AND STANDARDS**

### **Overview**

August 2016

#### **1. General**

The NFC GMO Guard (GMOG) program ensures that a final raw material or a single or multi-ingredient product does not contain any presence of GMO more than the program tolerance level of 5 PPM. This is accomplished via the analysis and control of raw material production, procurement and handling, manufacturing and distribution of the certified item(s).

#### **2. Facilities**

The certified facility must be maintained in a manner that allows a product flow which minimizes cross-contamination from receiving, to manufacturing and processing, to final packaging and shipping.

#### **3. Supplier Control**

The applicant must assure that its suppliers have in place effective GMP or food safety programs, and/or non-GMO programs that guarantee the materials intended for NFC GMOG certification meet these standards. See section on Sourcing of Raw Materials

#### **4. Production Equipment: Cleaning and Sanitation**

All equipment will be easily maintained to avoid cross contamination with non verifiable GMO materials. This includes easy access for conducting facility sanitation procedures, documentation of such procedures, and periodic review of protocols. All procedures for cleaning and sanitation of the equipment and the facility must be written and followed.

#### **1.5 Employees**

All employees must receive documented training in NFC GMOG procedures including receiving, manufacturing, cleaning and sanitation procedures. This can be done by the facility in conjunction with NFC and/or trained by employees who have been trained by NFC.

#### **6. Receiving, Storage and Shipping**

All raw materials and products must be verified and approved for GMOG production. Raw materials shall be clearly and properly marked, and carefully stored where products do not commingle. Raw materials must be tracked throughout the production audit system.

#### **7. Traceability and Recall**

All raw materials and products should be lot-coded and a recall system in place so that rapid, full traces and recalls can be conducted. A mock recall must be done at least every 6 months.



## **2.0 System Review and Analysis**

**2.1** Applicant will submit “The Talk” application (Addendum A). This is a preliminary, non-binding application for certification. Its purpose is to assess feasibility, financial investment, time frame, and maintenance of a program in the applicant’s food processing system.

2. NFC will identify and evaluate the raw materials of intended certified product Common GMO containing food sources or “ On Watch” ( not commercially available) are listed below.

**Corn** - Corn oil, flour, sugar or syrups. May be found in snack foods, baked goods, fried foods, edible oil products, confectionery, special purpose foods, and soft drinks.

### **Cotton**

**Cotton seed oil** - Cottonseed oil and linters. Products that may contain cotton seed oil are blended vegetable oils, fried foods, baked foods, snack foods, edible oil products, and small goods casings.

**Dairy Products** - milk based products, cheeses, yoghurts, etc

**Flax** - includes flax oil & seeds

**Honey** - can be found from GMO crops

**Meat** - Meat and dairy products that come from animals that are fed GMO containing feed sources

### **Papaya**

### **Peas**

**Potatoes** - This is a “ being watched material” - found in snack foods, processed potato products and other processed foods containing potatoes. A possible concern based on trials in varying amounts of acreage in US, Europe, Indonesia and elsewhere.



**Rapeseed** - or "canola" (Canadian oil)

**Red-hearted chicory** - (radicchio) - Chicory (*Cichorium intybus* var. *foliosum*)

**Rice** - Genetically modified to contain high amounts of Vitamin A.

**Soybean** - including, soy beverages, tofu, soy oil, soy flour, lecithin and various soy containing products such as but not limited to breads, pastries, snack foods, baked products, fried products, edible oil products

**Squash** - Some zucchini and yellow crookneck squash

**Sugars** - sugar cane, corn syrups, beet sugars

**Tobacco**

**Tomatoes**

**Vegetable Oil**

**Vitamins** - made from corn, made from soy and products that contain "carriers" derived from GM corn sources, such as starch, glucose, and maltodextrin.

### **Additional areas of concern re potential GMO contamination**

#### **A. Packaging**

1. Does the method of packaging affect the non GMO status of product it contains?
2. Is the package clearly labeled GMO GUARD?
3. Is each package and case legibly and accurately lot coded?

#### **B. Sanitation**

1. Can sanitation have an impact upon the GMO status of the certified product?
2. Can the facility and equipment be easily cleaned and sanitized to permit the safe handling of non GMO program?

## **Addendum A**

### ***NFC - The Talk Analysis***

- A) Does the food contain any sensitive ingredients that may present GMO contamination? These include, but are not limited to these raw materials or products that contain these raw materials and their derivatives :
- B) What needs to be done to insure raw materials are GMO certified/ free? Are they certified as non GMO? Will product needed to be tested before purchase only? Before receiving?
- C) What production method are used that may contain GMO ingredients: eg: fermentation cultures
- D) What food handling or food contact items ( oil sprays for sheet pans, for example) are used in formulating or in handling the food?
- E) Procedures used during processing:
  - i) Where in the production system can cross contamination occur? Examples are: shared storage areas of bulk materials ( such as rice, corn wheat, etc), shared equipment, parallel non GMO materials in facility.
  - ii) Does the layout of the facility provide an adequate separation of non GMO raw materials from GMO containing raw materials and foods?
- F) Does GMO containing materials and non GMO containing materials made in facility simultaneously? Do they share equipment during process (shared production lines, water systems etc.?
- G) Is the equipment designed so that it can be easily cleaned and sanitized? What product safety devices are used to enhance consumer safety?



## **Addendum B**

### ***Critical control points***

A critical control point is defined as a step at which a control can be applied and is essential to prevent or eliminate a GMO cross contamination or reduce it to an acceptable probability level.

Critical control points are located at any step where cross contamination can either be prevented, eliminated, or reduced to acceptable levels. Examples of CCPs may occur at: receiving, storage, processing, labeling, etc

NFC will identify any action or activity that can be used to prevent, eliminate or reduce a cross contamination.

NFC will identify the steps at which a Corrective Action Procedure will be instituted and followed when a deviation occurs.

Contact Us if you have any questions

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