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CODE OF PRACTICE FOR

MERCHANTING OF BULK COMBINABLE CROPS

Effective from **February 2014**

Trade Assurance Scheme for Combinable Crops

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Note: Requirements in ***bold italics*** are considered critical to food/feed safety. Non-conformances against these requirements will result in suspension from the scheme until rectified.

An **R** in the text indicates the areas where there is a need to keep a record.

This code quotes the relevant English legislation. In other parts of the United Kingdom the appropriate devolved legislation will be relevant.

A: INTRODUCTION

This Code of Practice aims to combine food/feed safety legal requirements with recognised industry good practice and specific customer requirements to provide confidence in the food/feed chain. TASCC participants must read this Code of Practice in conjunction with the TASCC Scheme Rules.

	REQUIREMENT	TASCC GUIDANCE
A1		
UPDATED	The Merchant must demonstrate the action taken when trading combinable crops to comply with food/feed safety legislation and customer requirements.	See Appendix 8 for guidance on implementation of HACCP and Appendix 10 for relevant legislation. Merchants should be able to demonstrate how specific customer requirements are understood.
A2		
UPDATED	This Code of Practice comprises a set of minimum standards to ensure food/feed safety which Merchants must achieve when trading the following categories of goods, which are, or may be, intended for human consumption after processing or which are intended to enter the food chain either for direct feeding to livestock or for incorporation into animal feedingstuffs: • All combinable crops, e.g. grain, pulses (peas and beans) and oilseeds (rapeseed and linseed), as-grown cereal seeds and herbage seeds (grass, clover, etc), pulse seeds and oilseeds for seed processing.	This includes imports, which are, or may be, intended for human consumption after processing or which are intended to enter the food chain either for direct feeding to livestock or for incorporation into animal feedingstuffs. This code of practice covers all goods whether home-produced or imported, assured or non-assured. Refer to the TASCC Scheme Rules for participant requirements and scheme regulations.
A3		
	This Code of Practice does not apply to the merchanting of other feed materials, compound feedingstuffs, or premixtures. Businesses merchanting these goods must obtain certification under the AIC Universal Feed Assurance Scheme (UFAS) for Merchants.	
A4		
	This Code of Practice is intended for the merchanting of both imported and exported combinable crops. Businesses whose activities include the import, export or shipping of combinable crops can also obtain certification by using mutually recognised schemes which are listed on the AIC website.	

		REQUIREMENT	TASCC GUIDANCE
A5			
		Combinable crop Merchants applying for TASCC certification who operate haulage, storage, import, export, shipping or testing facilities operations must also obtain, or have obtained, certification to the appropriate TASCC codes of practice. For a list of definitions as applied to the TASCC codes of practice, please see Appendix 10 of this code.	
A6			
		This Code of Practice enables Merchants to maintain the assured status of combinable crops that have been produced by members of recognised source-assured schemes. Adherence to this Code of Practice does not allow Merchants to describe or claim combinable crops as 'assured' unless the combinable crop has been sourced from a recognised source-assured scheme.	A list of mutually recognised schemes can be found on the AIC website.
A7 RENEWABLE ENERGY DIRECTIVE (RED)			
NEW	R	To comply with the EU Renewable Energy Directive (RED) appendix, TASCC Merchants must ensure they have registered with the TASCC Certification body and have been audited. Failure to do so will mean the crops cannot be sold as RED compliant.	The RED certification status of the participant can be found on the AIC Assurance Checker. Merchants will need to ensure that RED covers Storage Facilities storing RED Crops. Further information can be found in Appendix 11

B: STATUTORY REQUIREMENTS

This section outlines the main legal food/feed safety requirements for a food/feed business.

		REQUIREMENT	TASCC GUIDANCE
B1 INTRODUCTION			
		The Merchant must at all times exercise due diligence in the care of the goods and be conversant with and observe all relevant legislation. In particular the Merchant must be aware of the requirements contained within the Food Hygiene Regulations (EC No. 852/2004) and the Feed Hygiene Regulations (EC No. 183/2005).	
B2 CODE OF PRACTICE FOR THE CONTROL OF SALMONELLA			
	R	The current Defra Code of Practice for the Control of Salmonella must be complied with. The Merchant must demonstrate they have access and comply with to the code.	Merchants should consider the risk of Salmonella as part of their HACCP plan.
B3 REGISTRATION OF PREMISES TRADING FOOD FOR HUMAN CONSUMPTION			
UPDATED	R	Merchants must apply to the competent authority to register (and receive confirmation of receipt) their premises trading any goods which may be destined for human consumption in accordance with the requirements of the Food Hygiene Regulations 2004, (EC No. 852/2004), and any subsequent amendments or regulations.	NB: Registration applies to all sites whether physically handling crops or solely managing the merchanting activity. If rejected materials or screenings may be diverted for use in animal feed, registration under the Feed Hygiene Regulations will also be necessary (See B4). Applications should be made and a record of the application kept by the Merchant. Authorities vary around the UK in the way they deal with applications. For details on application in your area, contact your local council or trading standards.
B4 REGISTRATION OF PREMISES TRADING FEED FOR FOOD-PRODUCING ANIMALS			
UPDATED	R	Merchants must apply to the competent authority to register (and receive confirmation of receipt) their premises trading any goods which may be destined for food producing animals in accordance with the requirements of the Feed Hygiene Regulations 2005, (EC No. 183/2005), and any subsequent amendments or regulations.	NB: Registration applies to all sites whether physically handling crops or solely managing the merchanting activity. For the purposes of this legislation, equines (horses, etc) are defined as food-producing animals. Applications should be made and a record of the application kept by the Merchant. Authorities vary around the UK in the way they deal with applications. For details on application in your area, contact your local council or trading standards.

C: HAZARD ANALYSIS & CRITICAL CONTROL POINTS (HACCP)

This section outlines the requirements for a formal food/feed safety Risk Assessment.

		REQUIREMENT	TASCC GUIDANCE
C1			
	R	A formal food/feed safety Risk Assessment must be carried out with the aim of identifying and controlling any hazards that might adversely affect the integrity of the goods. Risk Assessments must be carried out in accordance with recognised HACCP principles as summarised below and detailed in Appendix 8: • Establish a Risk Assessment team • Define process steps • Carry out hazard analysis • Establish critical limits • Identify Critical Control Points • Implement control measures • Establish corrective actions • Carry out review/internal audits.	Article 6 of the Feed Hygiene Regulation (183/2005) states: "Feed business operators carrying out operations other than those referred to in Article 5(1) shall put in place, implement and maintain, a permanent written procedure or procedures based on the HACCP principles."A similar requirement exists in the Food Hygiene Regulation (852/2004). Further guidance on the implementation of HACCP is given in Appendix 8.

D: MERCHANT OPERATIONS

This section covers the requirements to ensure that merchanting operations are carried out with regard to food/feed safety and satisfying customer requirements.

		REQUIREMENT	TASCC GUIDANCE
D1 TERMS AND CONDITIONS			
D1.1 **UPDATED**	R	Where terms and conditions are received, these must be communicated to, and understood by, all relevant staff and subcontractors.	Terms and conditions may be included on the contract confirmation.
D1 SPECIFICATIONS			
D1.2	R	The Merchant must send or receive a contract specification confirming details of the sale/purchase between the Merchant and the contract/counterparty, unless the contract/counterparty elects not to receive such confirmations. Where applicable specifications agreed must identify: • Assurance status • Organic status • GM status.	NB: Brokers' confirmations are acceptable. Organic grain is not assured unless it is grown under a recognised source-assured scheme listed on the AIC website..

		REQUIREMENT	TASCC GUIDANCE
D1 SPECIFICATIONS (continued)			
D1.3	R	Where there is a difference in specification this must be resolved prior to delivery/collection.	
D1.4	R	A crop must be labelled or identified on accompanying documentation as genetically modified in accordance with current legislation and national guidelines.	The labelling of GM food and feed is covered by Regulation 1829/2003 EC on GM food and feed, and Regulation 1830/2003 EC on Traceability and Labelling of Feed Products derived from GMOs. See Appendix 9.
D2 DELIVERY/COLLECTION REQUIREMENTS AND ALLOCATIONS			
D2.1	R	There must be a system which records detailed information regarding customers' delivery/collection requirements. This information must be effectively communicated to all relevant staff (trading, transport etc).	Delivery/collection requirements are commonly referred to as fixings. Records of trading, fixings, allocations, transport and delivery are required for traceability purposes under food and feed legislation.
D2.2	R	There must be a system to effectively communicate delivery/collection to all third parties (Merchants, storekeepers hauliers etc).	Merchant must be able to demonstrate that the system is understood and adhered to by all relevant personnel.
D2.3	R	Crops must be allocated correctly to meet all customer/recipient requirements. Merchants must be able to demonstrate that the assurance status of crops is maintained during the allocation/delivery process.	Records of allocations are required for traceability purposes under Food and Feed Legislation.
D2.4		Delivery documents or labels for crops intended for feed use must comply with the Feeding Stuffs (England) Regulations 2010 (SI 2010 No. 3281).	Example of label which can be used to satisfy this legislation below and covers Store to End User. The example below fits on A4 labels Avery 7165 Parcel (4 x 2) or equivalent **Material** This is a feed material Moisture x% Net weight: see weighbridge ticket Batch: Include reference to traceability info Name and address of Merchant
D2 REMOTE MERCHANT SITES			
D2.5	R	Merchants must inform the Certification Body of all remote sites where merchanting activities take place, and all trading names used.	The certifier will not be required to visit all sites if it can be demonstrated through annual Internal Audit that all are operating to common procedures and all relevant records can be audited on site, e.g. by means of central computer systems.

E: PURCHASING, SELECTION AND APPROVAL OF SUPPLIERS AND SUB-CONTRACTORS

This section outlines the requirements for selecting and approving suppliers of crops and services.

		REQUIREMENT	TASCC GUIDANCE
E1 SUPPLIER/SUB-CONTRACTOR ASSURANCE STATUS			
	R	The Merchant must have controls to demonstrate that supplier/sub-contractor current assured status has been verified.	See trade farm assurance websites, Merchant terms and conditions, purchase acknowledgements, supplier database etc. For the purpose of this section, the definitions of a producer, supplier and sub contractor are below: Producer – Those who produce, manufacture, process or grow the food/feed ingredient. These do not need to be listed unless they supply direct to the TASCC participant,in which case they are also "suppliers". Supplier – Those who directly supply the Merchant with food/feed ingredients or compound feeds. These must be listed. Sub-contractor – Any individual/firm contracted by the Merchant to undertake work on behalf of the TASCC participant.
E2 CROP PRODUCERS			
E2.1	R	Crops from differing sources, suppliers or storage facilities must be evaluated for the presence of hazards.	This requirement does not require each parcel of crop to be sampled, inspected and analysed for hazardous impurities. The Merchant's HACCP plan will, however, have considered the risks and implemented appropriate controls for hazards. It is acceptable to take into account assurance status and past history of a supplier in evaluating hazards. See Appendix 8.
E2.2 UPDATED	R	Merchants engaging Crop Producers to deliver their own crops on their own vehicles/trailers must communicate that the operation of the Vehicle/Trailer (including Tractor & Trailers) complies with the current AIC Road Haulage Code of Practice.	This consent is a requirement of all contracts or terms and conditions.
	R	Further subcontracting of these deliveries can only take place with written consent of the Merchant	

		REQUIREMENT	TASCC GUIDANCE
E2 SOURCE-ASSURED SUPPLIERS/PRODUCERS			
E2.3 **UPDATED**		Only crops which have been produced by a member of a UK or Republic of Ireland (ROI) farm source-assured scheme recognised by AIC can be described as assured.	See the AIC website for a list of recognised source assurance schemes. Assurance status of growers can be checked on the relevant producer assurance websites.
	R	Merchants shall ensure that their assured supplier list matches the information (e.g trading name and/or farm name, the assurance number, site address and postcode for the primary producer held on the relevant farm assurance checker (e.g. Red Tractor Farm Assurance, and SQC). There must be a mechanism in place to ensure the assured supplier list is up to date.	NB: TASCC participants should be made aware of 'production only' or 'P' stickers. The stickers can only be used by producers up to 30th September or four weeks after harvest, whichever is later. AIC advises merchants to check the assurance status of producers to ensure that crops are collected/delivered before the end of the required period. This information can be obtained on the Red Tractor Assurance Checker on.
E3 ASSURED/NON ASSURED MERCHANT SUPPLIERS			
E3.1		**SOURCED ASSURED CROPS** Where crops are not purchased direct from the producer, the Merchant must only purchase from suppliers who are certified in a recognised merchanting/trading assurance scheme or the supplier must be audited by the Merchant in accordance with E4.6.	Agents purchasing crops on behalf of the Merchant need not be assured but should form part of the Merchant's training programme. A list of recognised schemes can be found on the AIC website. Only crops which have been produced by a member of a UK or Republic of Ireland (ROI) farm source-assured scheme recognised by AIC can be described as assured.
E3.2 **UPDATED**		**NON ASSURED CROPS** Where non assured crops are purchased and sold to a buyer, the Merchant can purchase from suppliers who are not assured.	
	R	Details of a full auditable trail of all non assured purchases must be retained. Stickers must not be used for these crops on the accompanying Combinable Crops Passport (Grain Passport).	
E4 APPROVAL OF SUB-CONTRACTORS			
E4.1	R	A list of approved sub-contractors must be maintained.	The AIC Assurance Checker and Save Search facility enables Merchants to create individual supplier databases. The frequency of review can be determined by a risk assesment.

	REQUIREMENT	TASCC GUIDANCE
E4 HAULAGE – SUBCONTRACTED AND WHOLLY CONTRACTED		
E4.2 **UPDATED**	Where a haulier is contracted by the merchant to perform a service with its customer for the carriage of goods within the scope of this code, the merchant must ensure that the haulier is either TASCC Haulage assured or equivalent (see Scheme Manual section 3.5), or is wholly contracted by the participant to the TASCC Code Of Practice For Road Haulage. Merchants who contract non-assured haulage companies who are wholly contracted to them must ensure the haulier/hauliers complete a Haulier Registration Form (Appendix 4) confirming a commitment to comply with the requirements of the TASCC Code Of Practice For Road Haulage. R The wholly contracted haulier must be audited annually, by the participant, to confirm compliance with the TASCC Code Of Practice For Road Haulage. A record of the audit must be maintained by the merchant. Merchants who engage Wholly Contracted Hauliers are audited to the Road Haulage Code of Practice.	Wholly contracted to a merchant means the haulier operates under the direct control of a TASCC assured company and does not undertake any work on his own behalf or for any other haulage company. The only audit requirement would then be an inspection of the vehicle for suitable identification and cleanliness. The TASCC Certification Body shall undertake to audit one third of the TASCC Merchants Wholly Contracted fleet at each audit. Over a three year period, all Wholly Contracted Hauliers that the TASCC Merchant employs must have received at least one audit. From February 1st 2012, former wholly contracted hauliers or new haulage businesses (ie one that did not exist prior to this date) can have wholly contracted status under the control of a TASCC merchant only if the vehicle/s they propose to use are either brand new or if previously used have detailed written evidence of previous activities which confirms that they have never carried materials on the AIC Exclusion List.
E4 CONTAINERS		
E4.2.1 **UPDATED**	R Merchants must maintain an up to date inventory containing TASCC and Non TASCC Containers. R Operated containers (hired or leased) must have records detailing the ID Number, date of use and/or hire period. R The Merchant must produce, or obtain, a documented Risk Assessment. R The Merchant must forward instructions of actions to be carried out prior to receiving and loading/stuffing. Before loading/stuffing containers, an inspection by the Merchant, or competent person, to verify that the container is clean or adequately lined must be completed. Liners must be used as per supplier's instructions. R Proof of appropriate cleaning and inspection must be maintained. R When loading/stuffing containers supplied by the customer the Merchant must ensure that customer requirements are obtained detailing the controls required for loading/stuffing, inspection, cleaning, disinfecting, lining etc. A record of the Customer requirements must be maintained.	Merchants who operate both TASCC and non TASCC containers should clearly identify those containers not to be used for food and feed. When prior usage is food or feed products cleaning should be in accordance with the Merchant's Risk Assessment. To ensure food and feed safety is maintained the Risk Assessment should consider some or all of the following: • the container's previous use • the container's construction • inspection required prior to loading/stuffing • pressure cleaning and disinfection prior to loading/stuffing • the use of liners to protect the crops/animal feed carried • customer's specific requirements. Customers may require adherence to the GAFTA 89 Contract.

		REQUIREMENT	TASCC GUIDANCE
E4 STORAGE SUB-CONTRACTORS			
E4.3.1 **UPDATED**	R	Where a storage sub-contractor is employed by the Merchant to undertake work either: • the sub-contractor must be TASCC (or equivalent) approved or • the sub-contractor must be inspected annually as part of the Merchant's TASCC certification. Prior to using the store, the Merchant must carry out a Risk Assessment to ascertain the assurance status of the store. A full audit must be carried out before the goods leave the store. If a sub-contract store is not used during the scheme year, and a Merchant wishes to use the store in a subsequent year, the store must be audited as part of TASCC. Stickers must not be used for nonassured grain delivered from TASCC stores, or for assured grain delivered from a TASCC store or site that is not listed on their certificate. See E4.7.	A sub-contractor audited by the Merchant shall not claim to be TASCC assured, and shall only carry out TASCC work for the Merchant who has audited them. The store should use the Merchant's TASCC stickers on grain passports.
E4 NEW STORES			
E4.3.2 **UPDATED**	R	TASCC Storage and Merchant participants must notify the TASCC Certification Body (CB) of any new stores (including owned and contracted stores) they wish to use for assured or non assured crops. The notification must be in writing to the CB and a response received detailing the CB's requirements before the store is used. The notification must include the store identification, full address and postcode. Once approved, the store details will appear on the AIC web listing.	The CB will respond to the participant and indicate how they may proceed and it may be that the store will need to be inspected prior to use.

		REQUIREMENT	TASCC GUIDANCE
E4 TESTING FACILITY SUB-CONTRACTORS			
E4.4 **UPDATED**	R	Where a testing facility sub-contractor is contracted by the Merchant to undertake contractual testing work, the sub-contractor must be independently certificated to a recognised testing facility assurance scheme. The laboratory must only carry out contractual tests that are included within the scope of their certification. Similarly testing facilities completing analysis under GAFTA/ FOSFA requirements must be approved to complete these tests.	Testing facilities carrying out *Salmonella* testing on feed materials must be approved under the Animal By-Products Regulations 2005 to complete these tests. See Section 3.4 of the TASCC Scheme Manual for the list of recognised schemes. Testing facilities carrying out testing for mycotoxins or other undesirable substances must be accredited to complete the tests.
E4 CARGO SUPERINTENDENTS, SUBCONTRACTORS, IMPORTS/EXPORTS			
E4.5.1	R	**CONTRACT** Where a Merchant trades under a GAFTA Contract they shall employ a cargo superintendent sub-contractor approved under the GAFTA Approved Cargo Superintendent scheme. Where a Merchant trades under any other contract or agreement and where a superintendent sub-contractor is employed the superintendent employed shall be approved under the GAFTA Approved Cargo Superintendent Scheme or equivalent scheme.	This applies to imports and exports transported by water, rail or road under GAFTA Contracts.
E4.5.2 **UPDATED**	R	**ADMINISTRATION** Where the Merchant employs a superintendent sub-contractor for the purpose of intake/outloading administration, instructions shall be issued by the Merchant and be documented. Instructions to a superintendent must include the appropriate TASCC requirements e.g trailer inspection.	These instructions cover all activities not covered by the GAFTA contract.
E4.5.3	R	**SUPPLIER TESTING** Where a Merchant employs a superintendent sub-contractor for the purpose of supplier contractual testing and a dispute arises the superintendent must submit the sample to a TASCC approved Testing Facility or equivalent.	

		REQUIREMENT	TASCC GUIDANCE
E4 SUB-CONTRACTOR AND SUPPLIER AUDITS			
E4.6 **UPDATED**		Where a Merchant conducts an audit of a sub-contractor or supplier they must ensure that;	Audit checklists are available on the AIC website.
	R	• The Merchant audits the subcontractor at least once a year	
	R	• The audit covers all relevant aspects of the TASCC code(s) of practice	
	R	• The sub-contractor provides evidence that all non-compliances have been resolved before work is sub-contracted	
	R	• All personnel carrying out sub-contractor audits must be able to demonstrate their knowledge and effectiveness in the role	
		Audits of Suppliers/Subcontractors must be completed competently and records demonstrate that the sub-contractor will be able to comply with the relevant Code of Practice in full.	
E4 IMPORT/EXPORT/SHIPPING FACILITIES			
E4.7 **UPDATED**		Where an import/export/shipping facility is employed by the Merchant to undertake work:	An import/export facility audited by the Merchant may not claim to be TASCC-approved, and may only carry out TASCC work for the Merchant who has audited him.
		• The sub-contractor must be TASCC approved or equivalent or	
	R	• The sub-contractor must be inspected annually as part of the Merchant's TASCC certification. See E4.6	
		• Where combinable crops are stored and returned to the UK, the requirements of E4.3 shall be met by the Merchant.	
		Stickers must not be used for non-assured combinable crops or for any crops delivered from a non-assured port facility on the accompanying Combinable Crops Passport (Grain Passport).	
		The store must use the Merchant's TASCC stickers Combinable Crops Passport (Grain Passport). If a sub-contract port facility is not used during the scheme year, and a Merchant wishes to use the store in a subsequent year, the store must be audited as part of TASCC.	

F: TRACEABILITY

This section outlines requirements for retaining traceability records.

	REQUIREMENT	TASCC GUIDANCE
F1		
R	The following information about combinable crops for each individual delivery must be recorded as an aid to traceability: • Quantity • Combinable crop name • Haulier (name/vehicle registration/ trailer reference) • Date of intake or despatch • Supplier • Delivery order or fixing reference where available for ex-store crops • Supplying store or farm • Through stores – where crops/materials are moved within the storage facility • Ship/vessel (if applicable) • Country of origin (if non-UK) • Assured status • Mycotoxin information/levels as per HGCA guidance (if applicable) www.hgca.com/mycotoxins • GM status (if applicable) • Organic status (if applicable). • Compliance with the Renewable Energy Directive (RED)	Deliveries include all movements of crops including: • Ship/vessel, farm or producer to storage operation • Ship/vessel or producer to third party store • Store to store • Farm, store, ship/vessel or producer to farm • Through stores – where crops/materials are moved within the storage facility.

	REQUIREMENT	TASCC GUIDANCE
F2 COMBINABLE CROPS PASSPORT		
UPDATED	Assured crops must be segregated from non-assured crops; any mixing of assured and non-assured crops shall cause the whole bulk to lose its assured status.	The Combinable Crops Passport should indicate vehicle ID (as per D2 of the Haulage code), pesticides and other treatments used, completion of vehicle inspection, farm assurance status and GM status (in the case of oilseed rape). Some assurance schemes issue stickers to members to identify assured crops, others issue coloured Combinable Crops Passport (Grain Passport).
R	All combinable crops of UK or Republic of Ireland origin must be accompanied on receipt by a correctly completed Combinable Crops Passport (Grain Passport).	
R	Merchants must supply confirmation to the storekeeper of their requirements relating to the Mycotoxin section (5) of the Combinable Crops Passport (Grain Passport).	Mycotoxin instructions should relate to intake and outloading. Merchants should be aware of individual customer requirements but it is recommended that when outloading crops from a commingled stock (central stores) that this is stated and the range of risk assessments and any analysis recorded on the Combinable Crops Passport (Grain Passport).
	Only crops produced under a recognised United Kingdom farm source-assured scheme or from a recognised Merchant supplier's store and identified by the appropriate Combinable Crops Passport (Grain Passport) with sticker are eligible for storage and outloading as assured commodities.	Vessels loaded for export outside the United Kingdom or for discharge elsewhere within the United Kingdom do not need to carry a Combinable Crops Passport unless requested by a customer.
	Stickers must not be used for: • non-assured crops delivered from TASCC stores • for assured crops delivered from a TASCC participant's store that has not been audited • for combinable crops imported from outside the United Kingdom, even where these are produced under an AIC TASCC recognised scheme as defined in section 3.3 in the Scheme Manual. Where crops are imported, then the word "IMPORTED" must be written across the top right hand sticker section of the Combinable Crops Passport (Grain Passport).	For the current Combinable Crops Passport (Grain Passport), see the AIC website. Incomplete or incorrectly completed Combinable Crops Passports (Grain Passport) may lead to rejections and delays at delivery destinations.
F3 TRACEABILITY		
R	Merchants must ensure that storekeepers keep traceability records.	Legislation requires 'one up/one down' traceability as a minimum, ie details of where the commodity came from, and where it was sent to. FSA guidance states this type of record should be retained for five years.
	When the owner of the crops gives instructions to store crops from one specifically identifiable parcel with crops from other parcels, this must be confirmed in writing.	Written confirmation required – can be part of formal agreement. Passports (originals or copies) must be kept at the store.

		REQUIREMENT	TASCC GUIDANCE
F4 GENETICALLY MODIFIED CROPS			
UPDATED	R	Genetically modified (GM) crops must be segregated from non-GM crops; any mixing of GM and non-GM crops shall cause the whole bulk to lose its non-GM status. Legislation requires that GM crops are clearly identified on documents and labels.	
F5 ORGANIC CROPS			
	R	Organic crops must be segregated from non-organic crops; any mixing of organic and non-organic crops shall cause the whole bulk to lose its organic status.	Customers may have additional requirements in relation to organic crops.
F6			
		The above information must be available to the competent authorities and on request to recipients to whom the combinable crops are supplied where it is believed a potential risk to food/feed safety exists.	It is a legal requirement that relevant documents are readily available in the event of a food/feed safety issue.
F7			
	R	Merchants whose TASCC assurance has been withdrawn must inform their customers in writing before deliveries are made.	The current lists of approved Merchants can be found in the AIC Assurance Checker on the AIC website.

G: CROP SAMPLING, TESTING AND INSPECTION

This section outlines the results to which the Merchant must have access to show compliance with maximum levels of contaminants laid down in current legislation.

		REQUIREMENT	TASCC GUIDANCE
G1 SAMPLING PLAN			
	R	The Merchant must ensure that sufficient testing is carried out to demonstrate control of any hazards and to confirm adherence to food/feed safety legislation. Where goods are to be analysed, they must be sampled in line with written sampling procedures.	The Merchant may wish to use information from external sources such as HGCA, AIC, GAFTA, FSA or customers as part of their test plan. Detailed advice appears in HGCA's 'Grain Sampling Guide' and AIC's 'Femas calculator' and 'Maize aflatoxin protocol'.

	REQUIREMENT	TASCC GUIDANCE
G2 TESTING FACILITIES		
	R When testing for hazardous impurities the Merchant must have access to a competent testing facility to conform with the above. R Alternatively the Merchant may have a written agreement with suppliers or customers to have access to relevant data.	The competent testing facility will be able to demonstrate accreditation to an appropriate standard for the tests/inspection completed e.g. TASCC Testing Facilities Code of Practice, Defra Approved Laboratory etc.
G3 HAZARDOUS IMPURITIES		
	R Merchants must have a procedure in place to ensure that when crops contain hazardous impurities, details of these are communicated to merchanting staff and effective corrective action taken.	The physical inspection may be completed by company staff, sub-contract testing facility, storage facility or customer.
G4 REVIEW OF TEST RESULTS		
	R Where test results for hazardous impurities fall outside the statutory limits, internal control limits or customer specified requirements within the crop specification, the Merchant must be able to demonstrate the corrective action taken.	Evidence that results are acted upon could form part of a due diligence defence in case of a food/feed safety issue.
G5 MONITORING CROPS IN STORE		
UPDATED	R Crops in storage must be monitored in accordance with E4 of the storage code. When monitored by the storekeeper the merchant may wish to receive the monitoring records. This must be confirmed in writing. Any records received by the merchant must be reviewed and corrective action taken where required.	The responsibility to comply with E4 of the storage code should be clearly defined in writing between the Merchant and storekeeper via terms and conditions or written instructions. The Merchant may choose to do additional monitoring and this must also be recorded and reported to the storekeeper.

H: HUMAN AND ANIMAL HEALTH

This section outlines arrangements that must be in place in case of a food/feed safety issue.

		REQUIREMENT	TASCC GUIDANCE
H1			
	R	A designated person must be responsible for notifying the appropriate authority (e.g. Defra, local authority, FSA) in the event of any occurrence that is a threat to food/feed safety. If appropriate, information concerning food safety hazards must be communicated throughout the food chain so that any hazard to human or animal health is prevented.	

I: NON-CONFORMING PRODUCT

This section outlines the procedures required to deal with non-conforming product.

		REQUIREMENT	TASCC GUIDANCE
I1 REJECTED PRODUCT			
UPDATED	R	Procedures and records produced by the Merchant must describe how crops rejected for hazardous impurities are managed after rejection. In certain cases crops may be safely processed to remove impurity. Actions of this type must be recorded.	
I2			
UPDATED	R	The Merchant must be able to demonstrate that destinations accepting crops that have been rejected for impurities have been advised of the impurity contained within the delivered crop unless the crop has been processed to remove the impurity. Crops containing impurities must not be directed to food/feed destinations, unless customer/recipients terms and conditions, or contract, allow. The Merchant must have evidence that the destinations have been advised accordingly unless receivers terms and conditions, or contract, allow. If the rejection of the goods is a potential feed/food risk, the Merchant may wish to complete a DPR form (Delivery Point Rejection) and this should be sent to the Certification Body.	It is a criminal offence to knowingly sell food or feed containing substances injurious to health.

	REQUIREMENT	TASCC GUIDANCE
I3 PRODUCT RECALL		
R	There must be a system for the product recall of crops, in the event that a risk to food/feed safety is identified. If the Merchant has any information about a serious health risk deriving from food or feed it must immediately notify the European Commission by using a RASFF (Rapid Alert System for Food and Feed). Further information can be found on http://ec.europa.eu/food/food/rapidalert/index_en.htm.	This is a legal requirement. When deliveries of combinable crops are identified as containing hazardous impurities at the delivery point, the merchant must implement a thorough investigation to establish if crops from the same batch have been delivered to the same or other destinations. In this case, and if this contamination could cause a risk to food/feed safety, then the merchant must implement the recall procedure.
I4		
R	A designated person with suitable deputies must be nominated to initiate and co-ordinate all recall activities. There must be a written recall procedure that is capable of being put into operation at any time, inside or outside normal working hours.	It is good practice to nominate an individual to manage the recall process thus speeding up the process and minimising risk to human and animal health.
I5		
R	If product recall becomes necessary the reasons for recall must be recorded and assessed and corrective action taken as necessary.	
I6		
R	The operation of any product recall must be reviewed so that procedures can be modified, if necessary.	
I7 DISPOSAL OF RECALLED CROPS		
R	Recalled crops must undergo a quality control re-assessment before they are put back into circulation or disposed of.	
I8		
R	The final destination of any recalled crops must be recorded.	This is required to demonstrate that any risk to human and animal health has been effectively controlled/prevented.

J: RECORDS

This section outlines the requirements to keep adequate records.

	REQUIREMENT	TASCC GUIDANCE
J1		
	An R in the text indicates the areas where there is a need to keep a record. A list of the records required is in Appendix 9.	The records listed can be in any form which allows information retrieval and verifies authenticity. Acceptable records include: • Computer records • Signed and dated entries in a daybook • Pre-printed forms.
J2		
	Internally produced records must be signed by the person carrying out the task/activity. If records are kept on computer the "signature" may be recorded as the name of the person.	If access to a computer system is password controlled, a "signature" is not necessary provided traceability of record creation can be demonstrated.
J3		
	Records must be legible and kept in suitable conditions that allow ready retrieval and prevent deterioration.	These records will also be important if enforcement authorities wish to carry out an investigation. It is therefore important that records are accessible and kept in good condition.
J4		
	Records must be kept for a minimum of three years, unless there are additional requirements.	For example, training records are of value indefinitely.

K: PERSONNEL AND TRAINING

This section outlines the requirements for staff and agents training.

	REQUIREMENT	TASCC GUIDANCE
K1 TRAINING		
	R Training must include the following as a minimum: • An understanding of the purpose this Code of Practice • All in-house procedures implementing the detailed requirements of this Code of Practice • The requirements of relevant food/ feed safety and hygiene legislation.	

		REQUIREMENT	TASCC GUIDANCE
K2 TRAINING			
UPDATED	R	Staff must receive training for all tasks that they are expected to undertake. Training and competence must be reviewed annually. Training records must be maintained for all relevant staff (permanent and temporary) within the business and include: • Date • Signature and printed name of both trainer and trainee • Topics covered • Certificates (where held) obtained from internal/external training organisations. The Merchant must demonstrate that training is completed within 1 month of a new TASCC code being issued. Training must include changes to procedures or relevant legislation.	Relevant staff means anyone who can affect food/feed safety.
K3			
		The Merchant must demonstrate how the business maintains a knowledge of current legislation.	This may be by membership of a trade body, subscription to trade journals/legislative updates, or regular access to other information sources such as the FSA website.
K4			
	R	A designated person must have authority and responsibility for the implementation of the requirements of this Code of Practice.	
K5			
	R	The designated person must ensure that all staff covered by the scope of the Code of Practice are provided with written instructions that confirm their duties and the procedures. Training to work instructions must be recorded.	Written instructions can take the form of a flow chart.
K6			
UPDATED	R	The interrelation of staff and job functions within the Merchant's operation shall be defined in an organisation chart.	This is a requirement under the Food/Feed Hygiene Regulations.

L: HACCP REVIEW/INTERNAL AUDIT PROCEDURES

This section outlines the requirement to check that controls implemented are working effectively to protect food/feed safety.

	REQUIREMENT	TASCC GUIDANCE
L1		
R	Merchants must have a documented procedure for internal auditing. The procedure must require the Merchant to carry out a programme of internal audits to check that internal systems are operating as intended and are also effective. Such internal audits must encompass: • Compliance with the requirements of this Code of Practice • Compliance with the requirements of the Merchant's HACCP system • Compliance with the Merchant's formal procedures • Compliance with applicable legislation pertaining to feed and food safety and quality • Satisfaction of specified customer/ recipient requirements.	The internal audit should check that procedures work and are being followed. The aim is to highlight – and correct – possible problems before a complaint or food/feed safety issue arises. Internal audits help prepare for your annual TASCC inspection. For a small business a possible approach would be to follow the paperwork for a contract from agreement to delivery, checking that all procedures were followed and records correctly completed. For a larger company auditing the function of each department may be more appropriate. Independence is important, so if the organisation is large enough auditors should not audit their own work.
L2		
	The programme of internal audits must ensure that all relevant activities are audited at least once a year.	
L3		
	All personnel carrying out internal audits must be able to demonstrate their effectiveness in the role.	Internal auditors should be sufficiently experienced to carry out effective and searching audits. External training is not required.
L4		
R	Internal audits must be documented and observations and non-conformances brought to the attention of those with responsibility for the area audited. These must record non-conformances against in house procedures and the TASCC codes of practice.	
L5		
R	Non-conformances must be corrected within agreed time limits and audit report records updated by an authorised person to indicate that corrective actions have been carried out.	It is a key part of the audit process that corrective actions are implemented and checked that they are working.

	REQUIREMENT	TASCC GUIDANCE
L6		
	R The Risk Assessment team must regularly review the HACCP plan with reference to control records and internal audit results to ensure and maintain the effectiveness of the system.	

M: COMPLAINTS PROCEDURE

This section outlines the requirements to manage complaints relating to food/feed safety effectively and consistently.

	REQUIREMENT	TASCC GUIDANCE
M1		
UPDATED	R The Merchant must document the procedure for handling complaints. This procedure must include systems for: • The prompt recording and investigation of complaints • The prompt feedback to the complainant with findings • Recording of the internal actions required to prevent recurrence. Actions taken must aim to resolve the root cause of the complaint to prevent recurrence.	The AIC complaints template is acceptable. Template documents are available on the TASCC CD and the AIC website at www.agindustries.org.uk

N: INSURANCE

	REQUIREMENT	TASCC GUIDANCE
N1		
	R Merchants must maintain insurance cover. These can be, for example: • Public/Product liability. • Motor • Goods in transit • Storekeepers liability The extent of the insurance cover must correspond to the value and the nature of the materials merchanted and customer's terms and conditions.	The TASCC Merchants may have appropriate means to deal with any claims that may arise as a result of liability either by self-insurance or commercial insurance. Levels of cover required will differ significantly depending on the crops marketed/ transported/stored and the scale of the risks involved. The completion of the TASCC audit does not mean that a participant is insured. It is important the TASCC Merchants confirms with their insurance company or broker that they are fully covered. The TASCC auditor is not in a position to do this.

APPENDIX :1

AIC Haulage Exclusion List

If a TASCC participant has any doubts over an unfamiliar product before loading, they must obtain a product data sheet and fax it to AIC on 01733 385270 or call the AIC Trade Assurance helpline on 0870 3000532 for further clarification and advice. To be read in conjunction with the TASCC Code of Practice for Road Haulage

1 BULK CARRYING VEHICLES (TIPPERS, TANKERS, WALKING FLOORS, RIGIDS AND TRAILERS ETC)

The following materials must not have been carried in vehicles used for transportation of goods covered by this Code of Practice. Hauliers must be prepared to give an undertaking to this effect if required:

MATERIAL	GUIDANCE
Category 1, 2 and 3 animal by products <u>except</u> animal derived dicalcium phosphate, hydrolysed proteins, fish meals, fish oils, fish protein concentrate, fish and fish by products and tallow produced in plants authorised in accordance with the EU 1069/2009 Animal By-products Regulations (see appendix 2)	e.g. meat and bone meal, meat meal, bone meal, blood meal, dried plasma and other blood products, hoof meal, horn meal, poultry offal meal, feather meal, dry greaves, and any other similar products, and includes mixtures, feedingstuffs, feed additives and premixes containing these products. This is not an exhaustive list.
All wastes obtained from the various phases of the urban, domestic and industrial waste water treatment process,	irrespective of any further processing of these wastes and also irrespective of the origin of the waste waters unsuitable for human consumption for reasons of freshness
Animal & poultry wastes	
Asbestos	or materials containing asbestos
Bituminous products	e.g. tar chips, tarmac planings,rag and recycled aggregates
Cereal & other seeds treated with toxic dressing	
Glass	(including cullet) and products thereof
Hide treated with tanning substances	including its waste
Livestock including poultry	also including their carcasses
Mammalian protein	Including any feed containing these materials e.g. (a) mammalian protein (including greaves), other than processed animal protein (see below), derived from the whole or part of any dead mammal by the process of rendering; or (b) any material derived from mammalian protein, and for this purpose "protein" means any proteinaceous material which is derived from a carcass but does not include milk or other milk products.
Manures, litter and composts (including Green Waste)	AIC Code of Practice for Deep Cleaning of Road Haulage Vehicles Bulk tipping vehicles which have carried manures, litters or composts but no other Exclusion List materials may be eligible to re-enter the TASCC Scheme by cleaning in accordance with the above code of practice. For more details see the TASCC Codes of Practice page on the AIC website, or contact PAI on 01423 878878.
Mineral clays	which have been used for detoxification purposes

MATERIAL	GUIDANCE
Old tyres	
Other products not responsive to normal detergent cleaning	
Pharmaceutical waste	
Radio-active materials	
Recycled sand	Under the prefix "Eco" – could be, for example, crushed glass or tarmac planings or used equine sand from livery yards.
Scrap metal	including fragmented metal and "frag rubber"
Solid urban waste	such as household waste, including products processed from this material
Toxic & corrosive materials	and any packaging used for these materials or any materials (e.g. timber) treated with these products
Untreated waste from eating places	except certain food stuffs of vegetable origin considered. Check with PAI or AIC for clarification before commitment.

NB: Many products now are of a recycled nature (or pre-fixed "Eco" or "Green") (e.g. recycled aggregates which can contain bitumen, scrap metal and glass) so ensure that a product data sheet is obtained and, if in doubt, contact AIC for clarification.

NB: Generic terms (e.g. Biomass) should not be used and descriptions should be as detailed as is necessary to accurately identify the product.

2 FLAT-BED VEHICLES

2.1 The following materials must not have been carried on vehicles used for the transportation of goods covered under this Code of Practice: -

- Radio-active materials

APPENDIX :2

AIC Haulage contaminant sensitive list

If a TASCC participant has any doubts over an unfamiliar product before loading, they must obtain a product data sheet and fax it to AIC on 01733 385270 or call the AIC Trade Assurance helpline on 0870 3000532 for further clarification and advice. To be read in conjunction with the TASCC Code of Practice for Road Haulage

Before handling any goods contained within the contaminant sensitive list, TASCC participants are advised to check customer terms and conditions.

Where vehicles are presented for the carriage of goods their load carrying areas must at all times be kept in a clean, dry and fit state to avoid harm to the goods being carried. Vehicles for carrying liquids should be in a condition fit for the purpose. It must be remembered that the Food Safety Act requires that any surface which comes into contact with food must be clean (see also Section E).

NB: Generic terms (e.g. Biomass or aggregate) should not be used and descriptions should be as detailed as is necessary to accurately identify the product.

1 PRESSURE CLEANING/DISINFECTING

R Lorries must be pressure cleaned with a 1% hot (70-80C) solution of a combined detergent/disinfectant suitable for use on food contact surfaces after they are used for carrying the goods listed below. The vehicle sheet must also be pressure cleaned in this way. The vehicle and sheet must be drained and dry before re-use for other loads. Proof will be required to be given that appropriate cleaning operations have been undertaken and they must be recorded on the consignment note of a subsequent load.

MATERIAL	GUIDANCE
Animal-derived dicalcium phosphate and hydrolysed protein (some Category 3 materials)	produced in plants authorised by the competent authority in accordance with the Animal By-Products Regulations 2011
Any product known to be salmonella positive	
Food stuffs of vegetable origin considered unsuitable for human consumption	for reasons of freshness
Packaging and parts of packaging from products used in agriculture or the food industry	
Silage	
Strong smelling materials	excluding fishmeals (see 7 - Fishmeal) - Strong smelling materials should normally be carried in dedicated vehicles which are not used for transporting other goods, because cross-contamination or taint of subsequent loads can lead to rejection and substantial claims for which the haulier may be held liable.
Tallows	

NB: Hauliers may find that some customers may not accept goods in vehicles which have carried these materials.

2 WASHING / BRUSHING / VACUUMING

R Proof will be required to be given that appropriate cleaning operations have been undertaken when the following materials have been carried prior to the carriage of goods covered by this Code. In most cases where the material is dry thorough brushing or vacuuming will be sufficient. However if the material is caked or damp, washing will be necessary

MATERIAL	GUIDANCE
Clean and un-used rubber bedding	including playground and arena mixes
Coal/fly ash/coal by-products	Before delivering or collecting Oil Seed Rape, check with customer the correct cleaning regime.
Fertiliser	
First time quarried aggregates/stone	not including bitumous or recycled products (see exclusion list)
Medicated feed products	
New tyres	
Peat	
Sand (First time quarried/ clean/builders sand)	
Salt	
Sheeted/Unsheeted Root crops and fruit	subject to risk assessment see D9
Untreated wood, sawdust or other materials derived from wood	

3 MOIST CO-PRODUCTS

R Vehicles that carry moist co-products must be clean and have any excess moisture removed before loading.

Vehicles used for the delivery of moist co-products must be cleaned and disinfected with a food grade disinfectant every three weeks as a minimum. This cleaning must include load carrying areas and the sheet inside and out.

Vehicles that carry moist co-products must be washed/brushed/dried before carrying dry products detailed in A.2 (see page 4). R

4 INFESTED PRODUCTS

R Vehicles which have carried infested products must be thoroughly steam cleaned. The vehicle sheet must also be steam cleaned in this way. The vehicle's load carrying area and sheet must be drained and dry before re-use for other loads. Proof will be required to be given that appropriate cleaning operations have been undertaken and they must be recorded on the consignment note of a subsequent load. The use of smoke bombs is not likely to be effective and is not recommended.

5 MATERIALS CAUSING ALLERGIC REACTIONS

EU legislation (Directive 2007/68/EC) identifies several groups of materials as causing allergic reactions in some people. In certain cases these reactions can cause severe anaphylactic shock, which can be fatal.

Participants must check and comply with individual customers policies/requirements/terms and conditions before handling any of the following products:

- Crustacean and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Milk and products thereof
- Nuts ie Almond (Amygdalus communis L.), Hazelnut (Corylus avellana), Walnut (Juglans regia), Cashew (Anacardium occidentale), Pecan (Carya illinoiesis (Wangenh.) K. Koch), Brazil (Bertholletia excelsa), Pistachio (Pistacia vera), Macadamia/Queensland (Macadamia ternifolia) and products thereof.

(NB: Nuts can be found in products such as confectionary waste biscuit meal, animal feed blends, chocolate bars and cereal bars)

(NB: Be aware that products described as nuts (e.g. "Sugar Beet Nuts") must not be confused with nuts as defined above as they are not necessarily allergens. As part of their due diligence, hauliers must provide clear evidence to customers of the difference)

- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations of more than 10mg/kg or 10mg/litre expressed as SO2
- Lupin seeds and products thereof
- Molluscs and products thereof

(NB: Cereals containing gluten (ie wheat, rye, barley, oats, spelt, kamut and their hybridized strains) and Soya are also identified in EU legislation as causing allergic reaction)

6 ORGANIC AND GENETICALLY MODIFIED GOODS

6.1 Organic Goods
Hauliers must check individual companies' policies before carrying organic goods.

6.2 Genetically Modified Goods
Hauliers must check individual companies' policies before carrying genetically modified goods.

7 FISHMEAL

Only fishmeal/fish oil which has been produced in plants authorised by the competent authority, in accordance with the Animal By-Products Regulations 2005, is permitted to be carried under this Code.

(NB: Attitudes towards and acceptance of fishmeal differ between end-user companies. Hauliers must check individual companies' policies before carrying this commodity).

If a vehicle is used for the transport of fishmeal and is subsequently used for the transport of other goods intended for:-

- Non ruminant animal feed materials or finished feeds R
  It must be thoroughly cleaned, in accordance with section 2 of this list and inspected before and after the transport of the fishmeal.
- All other purposes R
  It must be thoroughly cleaned and disinfected, in accordance with section 1 of this list and inspected after the transport of the fishmeal. This is particularly important where the goods may be used for human consumption.

8 NOPS

Naturally Occurring Prohibited Substances (NOPS) can be found in feeds given to competition horses and may result in disqualification if high levels are found during drug testing. Examples of these are bakery and biscuit products, confectionary, waste and poppies (seeds, heads and straw). NOPS should be written into the contract between TASCC participants and their customer/supplier. Therefore, it is important that all persons in the equine feed chain to adopt a policy of feed supply that will take every precaution to minimize the risk of feeding a horse with such a prohibited substance. If you are handling these products, then you need to inform your customer/suppliers.

Further details can be found in the UFAS Compound Code (Appendix (page 84) pages of the AIC website:

http://www.agindustries.org.uk/document.aspx?fn=load&media_id=3606&publicationId=93

Sensitive list matrix

NB: This matrix is shown as a guide only – a full description can be found in the sensitive list.

PROCESS	Pressure Cleaning AND Disinfecting	Washing OR Brushing OR Vacuuming
MATERIAL		
Aggregates including first time quarried aggregates/stone – not including bituminous or recycled products (see exclusion list)		✔
Animal-derived dicalcium phosphate and hydrolysed protein produced in plants authorised by the competent authority in accordance with the Animal By-Products Regulations 2005	✔	
Clean and un-used rubber bedding		✔
Coal / fly ash / coal by-products		✔
Fertiliser		✔
Fishmeal/fish oil – when next load is non ruminant animal feed materials or finished feeds		✔
Fishmeal/fish oil – when next load is any other material	✔	
Foodstuffs of vegetable origin considered unsuitable for human consumption for reasons of freshness	✔	
Infested products	Steam clean	
Medicated feed products		✔
Moist co-products	Weekly	✔
Packaging and parts of packaging from products used in agriculture or the food industry (excepting where there is a risk of contamination from Exclusion List materials)	✔	
Peat		✔
Sheeted/unsheeted root crops and fruit		✔
Salmonella positive products	✔	
Salt		✔
Silage	✔	
Strong smelling materials, excluding fishmeals	✔	
Tallows/Used cooking oils	✔	
New tyres		✔
Untreated wood, sawdust or other materials derived from wood		✔
Check company policy regarding cross contamination		
Allergy causing materials		
Organic and genetically modified goods		
Naturally Occurring Prohibited Substances (NOPS)		

APPENDIX :3

Haulier registration

To be completed by non certified wholly contracted hauliers and return to the TASCC Participant who will then send to the to TASCC Certification Body, PAI.

*I/we hereby confirm that I/we _____

(name(s)) _____

(company) _____

(address) _____

_____

_____

_____

Please give trailer/vehicle numbers which are dedicated to this business for all products carried.

_____

_____

have received a copy of the AIC Code of Practice for Road Haulage of Combinable Crops and Animal Feeds effective from February 1st 2014.

*I/we have read and understood the Code of Practice. In consideration of the TASCC Participant placing with me/us orders for the carriage of "goods" as defined in this Code of Practice I/we undertake that the Code of Practice will be complied with by all drivers and vehicles under my/our control.

Signed: _____

Name: _____

Position: _____

Date: _____

© TASCC Participants are entitled to photocopy this page to create their own records

APPENDIX :4

Approved storage chemicals

PRODUCTS APPROVED FOR USE IN GRAIN FEED/STORES AND STORED GRAIN/FEED
READ THE LABEL BEFORE USE – USE PESTICIDES AND BIOCIDES SAFELY.

NB: Plant Protection Products (PPPs) are under constant review and approval may be withdrawn at short notice. Storekeepers should therefore check the current position regarding approval before using any product. This list is for information purposes only and whilst AIC have used their best endeavours to ensure the accuracy of the list, they do not accept any liability for the accuracy of this list. STORE KEEPERS MUST CHECK THE APPROVAL STATUS OF EVERY PRODUCT BEFORE USE.

FUMIGANTS

Product	MAPP Number	Active Ingredient	Additional Information
Detia Gas Ex-P	09802	Aluminium phosphide	Only to be applied by professional contractors
Detia Gas Ex-T	03792	Aluminium phosphide	Only to be applied by professional contractors
Detia Gas Ex-B	06927	Aluminium phosphide	Only to be applied by professional contractors Bag, belt or blanket formulation for easy removal of spent material
Phostoxin I	05694	Aluminium phosphide	Only to be applied by professional contractors
Degesch Fumigation pellets	11436	Aluminium phosphide	Only to be applied by professional contractors
Degesch Fumigation Tablets	09313	Aluminium phosphide	Only to be applied by professional contractors
Detia Gas Ex-B Forte	10661	Magnesium phosphide	Only to be applied by professional contractors. Bag formulation for easy removal of spent material
Degesch Plates	07603	Magnesium phosphide	Only to be applied by professional contractors Plate formulation for easy removal of spent material
ProFume	12035	Sulfuryl fluoride	Only for empty stores. Only for use by professional contractors.

PRODUCTS APPROVED FOR USE IN EMPTY GRAIN STORES

SMOKE GENERATORS

Product	MAPP Number	Active Ingredient	Additional Information
Actellic Smoke Generator No 20	15739	Pirimiphos-methyl	Last date for storage and use of MAPP was 31st March 2013. For stores intended to contain cereal grains

SURFACE SPRAYS

Product	MAPP Number	Active Ingredient	Additional Information
Reldan 22	12404	Chlorpyrifos-methyl	
K-Obiol EC25	13573	Deltamethrin	
Aquapy	HSE 5799	Pyrethrins	Approval granted on 8th March 2010 for use in empty grain silos and empty grain transport
Aquapy Micro	HSE 6296	Pyrethrins	UVL application. Approval granted on 8th March 2010 for use in empty grain silos and empty grain transport
Pybuthrin 33	HSE 5106	Pyrethrins	

PRODUCTS APPROVED FOR USE ON STORED GRAIN

Product	MAPP Number	Active Ingredient	Additional Information
Actellic 50 EC	12726	Pirimiphos-methyl	No with-holding period. Approved for use on malting barley and milling wheat wheat and seed grain
Reldan 22	12404	Chlorpyrifos-methyl	90 days minimum between treatment and removal from store for consumption or processing. Approved for use on malting barley but has with-holding period
K-Obiol ULV6	13572	Deltamethrin	No withholding period. Accepted by NABIM and Campden BRI. Can be used on wheat, barley, oats, maize, rice, rye, triticale and pulses. Apply through low volume fogger.
K-Obiol EC25	13573	Deltamethrin	No withholding period. Accepted by NABIM and Campden BRI.Can be used on wheat, barley, oats, maize, rice, rye, triticale and pulses.

** **Note:** there are a number of products that may be used in grain storage areas **provided grain and surfaces liable to be in contact with grain are protected.** These products are approved as biocides by the HSE. No product is approved for the treatment of oilseeds.

APPENDIX :5

Further reading

DEFRA Code of Practice for the Control of Salmonella during the Storage, Handling and Transport of Raw Materials intended for incorporation into, or direct use as animal feedingstuffs. Revised 2003.

Available free, quoting reference number PB 2202, from:
Defra Publications,
AD MAIL 6000, London, SW1A 2XX
Tel: 08459 556000

Or download from:
www.defra.gov.uk/animalh/diseases/zoonoses/salmonella-cop.htm

HGCA
Agriculture and Horticulture Development Board
Stoneleigh Park
Kenilworth
Warwickshire
CV8 2TL
Tel: 0247 669 2051
email: admin@hgca.ahdb.org.uk

HGCA Grain Storage Guide, 3rd Edition 2011
HGCA Safe Storage Time Calculator
HGCA Rodent control in agriculture – a guide
All can be downloaded from
www.hgca.com/grainstorage

Food Safety Regulations published by the Foods Standards Agency 2002

Available from:
FSA Publications,
Tel: 0845 606 0667
Fax: 020 8867 3225

quoting reference number FS/0421/0202

The Feeds Directory – Dr WN Ewing
ISBN 1-900043-01-2

Defra Code of Practice for The Safe Use of Pesticides on Farms and Holdings (Green Code)
Available from:
Defra Publications, address as above, quoting reference number PB 3528.

SCIMAC Guidelines
Available from:
SCIMAC
c/o Frontfoot Communications Ltd
The Old Dairy, Fellnaw Farm
Ringford, Castle Douglas
DG7 2A

T: 01557 820504
F: 01557 578161

APPENDIX :6

Salmonella sampling and testing procedure

The aim of the monitoring is to check on the environmental hygiene of the premises, equipment, incoming and outgoing products and, if necessary, take corrective action.

The buildings, environment, plant and equipment, as well as incoming and outgoing product, must be subject to appropriate monitoring. Sampling schedules should take account of:

1. Intended use;
2. Inherent bacteriological risks;
3. Nature and sources; and
4. Past results

Please refer to the Salmonella code for full details, the following is a suggested appropriate sampling regime.

1. Storekeepers must arrange for samples to be taken from goods and analysed, where this is not done by the owner of the goods, as follows:

a. Incoming goods. The frequency of sampling should be based on high, medium and low risk- composite samples are acceptable by product type. Data may already be available from the supplier or owner of the goods. For high risk products every load should be sampled. From a historical analysis of DEFRA data, isolations (weighted by tonnage) have been most frequent in rape, fishmeal, cocoa and soya beans and their derivatives.

b. Outgoing goods. Manufactured products by product or process type-composite samples are acceptable, frequency based on high, medium and low risk also taking into account the processing carried out.

c. Samples must be drawn into a new clean bag using the "reverse bag" sampling method as a minimum. A minimum sample size of 60g is required but the exact requirement should be agreed with the testing laboratory.

2. Storekeepers must arrange for the following samples to be taken and analysed as follows:

a. Buildings. Samples from ledges, walls, floors, storage bin tops and outloading areas and where health and safety rules allow -samples from dust units, vacuum cleaners and the inside of storage bins may be included. Samples of dust can be taken direct into a "reverse bag" or sterile pot or, if quantities are too small, by using swabs. Dust samples are normally much more effective than swab samples and are therefore preferred. The sampling points must be determined using HACCP Risk Assessment principles. Samples from common equipment areas such as vacuum cleaners and dust units are useful to determine the overall Salmonella risk in the storage area.

b. The best method of sampling is to take approximately 20g bulked samples comprising dust from at least ten places around the building. These can be taken into an inverted polythene bag or with new disposable plastic gloves. Where dust levels are insufficient for 20g then a greater number of sampling places may be used. The use of a brush is not recommended to help collect samples unless it can be washed in a sterilising solution and fully dried; a plastic scraper washed in a sterilising solution and dried may help in the sample collection.

c. If swab samples are utilised they must be taken with sterile swabs according to the supplier's instructions. Swabbing normally consists of wiping of the swab (after removal from its transportation tube) over as large and representative an area as practicable until the swab is well coated with dust, or accumulated aggregate within equipment. Disposable wooden scrapers or plastic spoons can also be used to sample adherent material. The sample is returned to the tube and labelled with details of the sample area and date of sampling.

d. Frequency of sampling should be based on Risk Assessment- for a high risk product weekly testing is recommended. If the risk status of the product cannot be determined it should at least initially be considered as high risk.

e. Plant and equipment. Loading equipment, elevators, conveyors, dust filters, intake and loading areas in stores- either dust or swab samples. Frequency of sampling based on Risk Assessment- weekly suggested when materials are of unknown or high risk

f. Vehicles. Buckets and vehicle bodies of loading shovels – dust or swab samples.

3. Analysis.

a. Samples must be tested in accordance with approved methods laid down in The Animal By-Products Regulations 2005 (SI No 2005/2347) at a Defra listed laboratory that is approved under those regulations or to ISO 17025 standards.

4. Action to be taken following isolation.

a. The following should be advised of isolations of Salmonella:

i. Defra and, where appropriate, the relevant devolved administrations (the Zoonoses Order 1989 requires laboratories to report all isolations of Salmonella from animal/poultry feedstuffs and ingredients to Defra).

ii. If incoming goods are found to be positive then the storekeeper must immediately discuss remedial action with the owner of the goods.

b. Where there is contamination with a regulated serovar*, or where the same serovar is regularly detected over time, then detailed investigation to identify the source or to ensure there is no ongoing contamination is recommended. If there is persistent contamination samples should be taken and tested after any remedial action.

c. Increasing the level of testing of the product should be considered

d. Further actions are detailed in the Defra Code of Practice for the Control of Salmonella and will depend on the circumstances of isolation.

* Regulated serovars are those of major public health significance. Currently these are S. Enterditis, S. Typhimurium, S. Infantis, S. Virchow and S. Hadar.

APPENDIX :7

HACCP

References:

- Campden BRI, Technical Manual No. 42- 'HACCP: A Practical Guide (Third Edition)'
- Campden BRI, Guideline No. 10 'HACCP in Agriculture and Horticulture (Second Edition)' Supplement 7 'Grain Storage Case Study'
- Codex Alimentarius Commission Document – 'Recommended International Code of Practice General Principles of Food Hygiene – CAC/RCP 1 – 1969, Rev. 4 – 2003' www.codexalimentarius.net/search/advancedsearch.do

1. Risk Assessment team
   In order to establish a Risk Assessment system, the applicant must appoint a team to conduct the Risk Assessment study that comprises personnel from all of the relevant operations and functions within the company and at least one member with formal HACCP training. The members of the team must be recorded within the Risk Assessment study.

   It is acceptable for individual members of staff to fulfil multiple roles in the Risk Assessment team or to utilise resources from outside of the company, provided that the role of the Risk Assessment team remains demonstrably effective.

2 Defining process steps
   The Risk Assessment team must identify and record all of the process steps involved in the merchanting operations from purchase of crops through storage and transport to delivery to the customer and must be in the form of a flow diagram of the operation/process.

3. Hazard analysis
   The Risk Assessment team must identify and record any possible chemical, physical or microbiological hazards that could occur at each process step and adversely affect the traded materials, recognising the nature of their products and their intended use.

   a. Pre-requisites
   For practical purposes, Merchants may wish to recognise 'pre-requisites' for the HACCP scheme they implement. These are specified, formal procedures that control potential hazards on a business wide basis, such as selection of subcontractors, training, etc and help to prevent repetition of hazards and control measures at multiple process steps. Such pre-requisites must be defined as part of the HACCP plan and included in any auditing schedule established as a result of the HACCP plan.

4. Identify Critical Control Points
   Where it is essential that a hazard is controlled at a particular process step (ie the hazard cannot be controlled or eliminated at a later process step), this step must be identified as a Critical Control Point (CCP). To help identify which steps are CCP's an example decision tree is provided in Figure 1 below.

5. Establish critical limits
   The Risk Assessment team must identify the Critical limits for all of the critical control points and pre-requisites that have been identified and be able to show the basis on which the suitability of these limits is based. Critical limits must be set at levels such that the safety and integrity of the traded materials is assured.

6. Control measures
   For each process step at which a hazard is identified, the Merchant must implement and record a system or procedure to control the operation. These are known as control measures and must be sufficiently robust to control hazards and ensure that critical limits are not exceeded. The operation of the control measures must be monitored and recorded to allow the Merchant to demonstrate the hazard is controlled and to allow action to be taken if critical limits are exceeded.

7. Actions when hazards are not under control
   The Merchant must take suitable, prompt and effective remedial action when monitoring shows that hazards are not within critical limits. The Merchant must record the action taken and make sure that actions are designed to deal with the cause of the problem as well as the problem itself.

8. HACCP reviews
   The Merchant's Risk Assessment team must carry out regular reviews of the HACCP system. The aim of these reviews is twofold:

   (1) To check whether requirements of the system are being met (ie are procedures being followed);

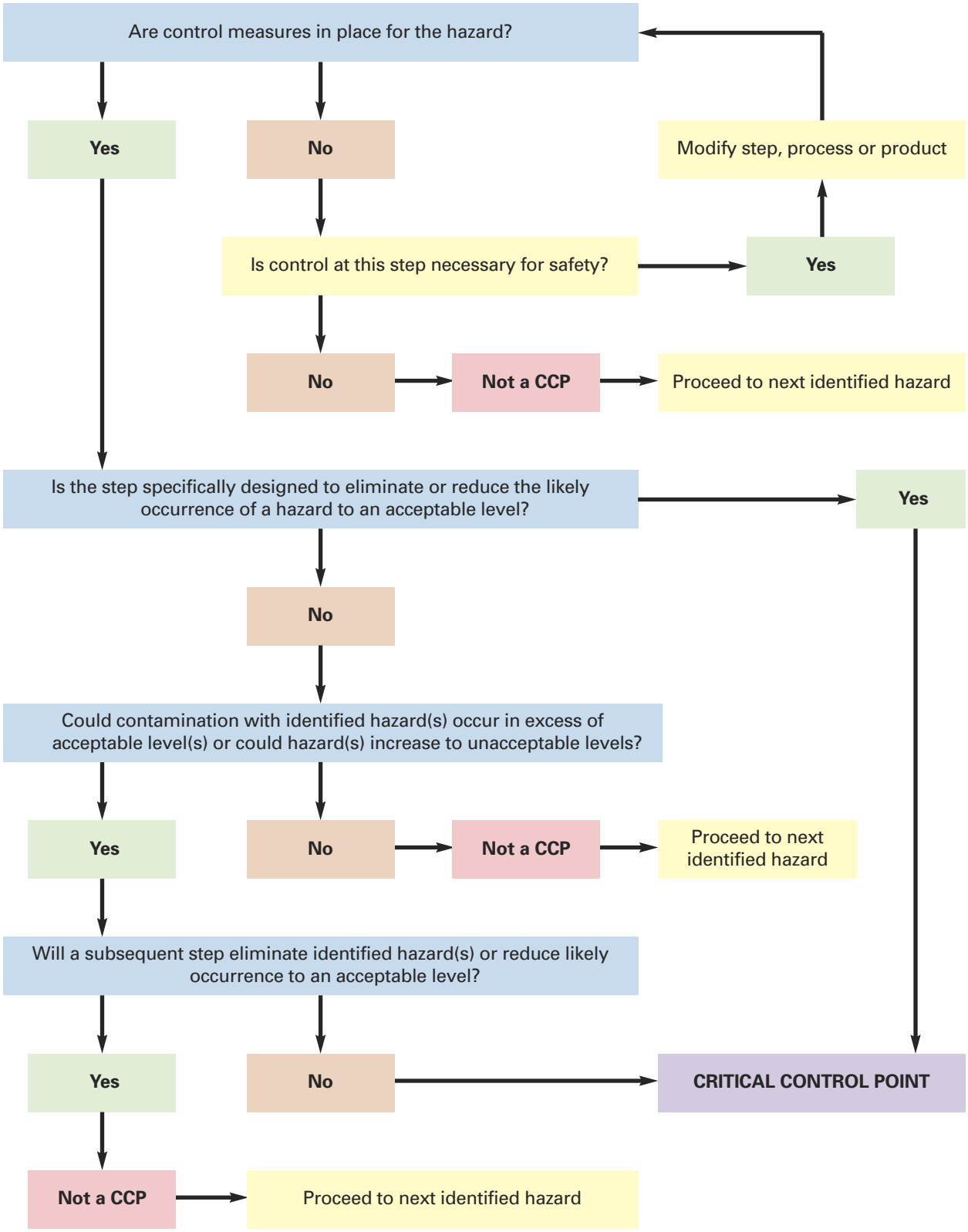
   (2) To check that the system effectively and consistently ensures the safety and integrity of traded materials (ie are procedures effectively controlling hazards).

   At least one complete review must be carried out each year, but more frequent reviews may be necessary due to other changes in the business. Examples of changes which may require an additional HACCP review are:
   - A new piece of equipment
   - A new commodity being traded
   - When critical limits are exceeded
   - Changes in personnel/procedures.

   A record must be kept of HACCP review showing the Risk Assessment team findings and actions required. For practical reasons, many Merchants will carry out the HACCP review in conjunction with their internal audits.

FIGURE 1 DECISION TREE TO IDENTIFY CCPS

(answer each question in sequence for each identified hazard at each process step)



APPENDIX :8

Records

The following list represents the minimum records which must be kept by a Merchant to comply with this code:

A7	Renewable Energy Directive
B2	Control of salmonella
B3	Food Hygiene Regulation registration
B4	Feed Hygiene Regulation registration
C1	Hazard Analysis and Critical Control Points (HACCP)
D1.1	Customer terms and conditions
D1.2/D1.3/ D1.4	Contract specifications
D2.1/D2.2	Customer delivery/collection requirements
D2.3	Allocations
D2.5	Remote merchant sites
E1	Supplier assurance status
E2.1/E2.2	Crop producers
E2.3	Source-assured supplies
E3.1/E3.2	Merchant suppliers
E4.1	Sub-contractor/supplier approval
E4.2	Wholly contracted hauliers
E4.2.1	Containers
E4.3	Storage sub-contractors
E4.4	Testing facility sub-contractors
E4.5.1/E4.5.2 /E4.5.3	Cargo superintendent sub-contractors
E4.6	Sub-contractor/supplier audits
E4.7	Import/export/shipping/facilities
F1/F2/F3/ F4/F5	Traceability records
F7	Withdrawal of TASCC status
G1	Crop sampling plan
G2	Competent testing facilities
G3/G4	Review/action for hazardous impurities
G5	Monitoring product
H1	Identification of designated person
I1	Monitoring product
I2	Rejections procedures/records
I3/14	Product recall procedure
I5/16	Product recall records
I7/18	Disposal records
K1	Training
K2	Training records
K4	Designated person
K5	Procedures
K6	Organisational chart
L1/L4/ L5/L6	Internal audits/HACCP review
M1	Complaints procedure and records
N1	Insurance

Due to the nature of individual businesses, other records may also be necessary.

APPENDIX :9

Legislation

This list is not exhaustive, but highlights the key food feed safety legislation which must be understood and complied with:

Europe

- Feed Hygiene Regulation (EC No. 183/2005)
- Food Hygiene Regulation (EC No. 852/2004)
- General food hygiene requirements (EC No. 178/2002)
- Directive 2003/89 Annex IIIa – Food Labelling Amendment
- Commission Regulation (EC No 466/2001) setting maximum levels for certain contaminants in foodstuffs (Amended by regulation number 856/2005 (fusarium toxin) and regulation 199/2006 (dioxins and dioxin like PCBs))
- Regulation 1829/2003 EC on GM food and feed
- Regulation 1830/2003 EC on Traceability and Labelling of Feed Products derived from GMOs

Copies of the legislation can be found at the following website:

Eur-lex: www.eur-lex.europa.eu/en/index.htm

UK

- Transmissible Spongiform Encephalopathies (No. 2) Regulations 2010 (SI 2010 No.801)
- The Feed (hygiene and enforcement)(England) Regulations 2005 (SI 2005 No. 3280)
- The Official Feed and Food Controls (England) Regulations 2006 (SI 2006 No. 15) www.opsi.gov.uk/si/si2006/20060015.htm
- Feeding Stuffs (England) Regulations 2010 (SI 2010 No. 3281) (Amendment – SI 2006 No. 2808)
- The feed (specified undesirable substances) (England) Regulations 2006 (SI 2006 No. 3120) (Amends Feeding Stuff (England) regulations
- Food Hygiene (England) Regulations (SI 2006 No. 14) www.opsi.gov.uk/si/si2006/uksi_20060014_en.pdf
- Contaminants in Food (England) Regulations 2006 (SI 2006 No. 1464)

NB: Please note that versions of the above legislation can also be found on the same web sites for Scotland, Wales and Northern Ireland

Further information can be found at the following websites:

AIC: www.agindustries.org.uk

Defra www.defra.gov.uk

TSE legislation
www.defra.gov.uk/animalh/bse/legislation/index.html

FSA www.food.gov.uk

Office of Public Sector information
www.opsi.gov.uk

Code of Practices

- Defra Code of Practice for Control of Salmonella during Storage, Handling and Transport of Raw Materials intended for incorporation into, or direct use as animal feedingstuffs.

Available free, quoting reference number PB 2202, from:

Defra Publications,
AD MAIL 6000
London
SW1A 2XX
Tel: 08459 556000

Further information can be found at the following website:

Salmonella Code of Practice
http://www.defra.gov.uk/animalh/diseases/zoonoses/salmonella-cop.htm

APPENDIX :10

Definitions

For the purposes of this code the following definitions shall apply:

combinable crop
means any crop harvested by a combine

goods
shall include any of the commodities listed in A2

storekeeper
shall mean the operator of any store used under this code

store
shall include any building, shed, silo, bin, tank or other container used to store goods

the Defra Code of Practice for the Control of Salmonella shall mean the Defra Code of Practice for the Control of Salmonella during the storage, handling and transport of raw materials intended for incorporation into, or direct use as, animal feedingstuffs

processed animal protein
means meat and bone meal*, meat meal*, bone meal*, blood meal*, dried plasma* and other blood products*, hydrolysed protein, hoof meal, horn meal, poultry offal meal, feather meal, dry greaves, fishmeal, dicalcium phosphate and tricalcium phosphate of animal origin, gelatin and any other similar products including mixtures, feedingstuffs, feed additives and premixtures, containing these products
* *whether of mammalian or non-mammalian origin*

derogated protein
means fishmeal, dicalcium phosphate or tricalcium phosphate of animal origin or hydrolysed protein (as defined in the TSE Regulations) which are prohibited in farmed animal feeds intended for ruminants but permitted in such feeds intended for non-ruminants

food producing animals
means cattle, sheep, goats, deer, pigs, poultry, rabbits, horses, fish or any other animals which may be used for human consumption or used to produce foods for human consumption

farmed ruminants
means cattle, sheep, goats or deer including pet, zoo and safari park animals

COSHH
means the Control of Substances Hazardous to Health Regulations

biomass
means any material after full HACCP assessment that is deemed by the relevant GAFTA/AIC Stores Sub Committee to be acceptable

haulier
means the operator of any vehicle used under this code

vehicle
includes trailers or other containers used to transport goods

merchant
means a company trading or selling goods

complaint
means any expression of dissatisfaction from a customer about the goods or the service

APPENDIX :11

AIC Requirements for Trade Assurance Participants to comply with the Renewable Energy Directive (RED) – DIRECTIVE 2009/28/EC

INTRODUCTION

The following RED Requirements document is designed to be incorporated into AIC schemes as an appropriate and auditable appendix.

It relates to the following AIC Trade Assurance Schemes:-

1. TASCC – Trade Assurance Scheme for Combinable Crops
2. UFAS – Universal Feed Assurance Scheme

In order to comply with this document, trade assurance participants must register with the relevant Certification Body so that RED can be added to the scope of their audit and certificate. This RED Requirements document can also be found on the following AIC link (TBC).

An **R** in the text indicates the areas where there is a need to keep a record.

CONTENTS

1: PURCHASING RED COMPLIANT MATERIAL

2: MASS BALANCE REQUIREMENTS

3: SUSTAINABILITY CRITERIA REQUIREMENTS

		REQUIREMENT	TASCC GUIDANCE
1 PURCHASING RED COMPLIANT MATERIAL			
1.1 **NEW**	**R**	Scheme participants must be able to show that any procured Renewable Energy Directive (RED) crops are compliant to the requirements of RED.	To be able to show compliance with the requirements of the RED, scheme participants shall have records available to show that all material purchased as being RED compliant can be demonstrated as such. Records should be in the form of Combinable Crops passport (section 8 signed by the grower/storekeeper) or by the delivery documentation provided by the merchant. Evidence of compliance can only be accepted from those schemes recognised by the EU for all land related criteria. The appropriate link to the document on the AIC website is -http://www.aictradeassurance.org.uk/tascc/documents/codes-of-practice/ Records shall show which EU approved voluntary scheme material has been supplied from, cross-checking it is the same version and scope as that recognised by the EU. Full details of all recognised schemes and their scope can be found at http://ec.europa.eu/energy/renewables/biofuels/sustainability_schemes_en.htm

		REQUIREMENT	TASCC GUIDANCE
2 MASS BALANCE REQUIREMENTS			
2.1 **NEW**	R	Records shall be maintained in such a way as to ensure that the requirements of the Renewable Energy Directive, in relation to a mass balance calculation – including sustainability characteristics – are met.	In order to comply with the mass balance requirements of the RED, the scheme participant shall be able to determine, for each three month time period, that quantity of crop taken into store which the supplier(s) has confirmed as being RED compliant. The scheme participant shall also have records to demonstrate, over the same defined time periods, the quantity of crop loaded out of the store as RED compliant. In all instances the mass balance of RED compliant material for the time period in question must show the quantity out as being equal to, or less than, the quantity taken in. Records need to be kept to show that the sustainability criteria set out in Article 17(2-5) of the RED have been met. This is achieved through the use of a mass balance system which delivers the following: • allows consignments of raw material with differing sustainability characteristics to be mixed; • requires information about the sustainability characteristics and sizes of the consignments to remain assigned to the mixture; and • provides for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all the consignments added to the mixture.
2.1.1 **NEW**		Determination of mass balance calculation shall be operated at the site level	The attached annex is provided as an example only of a way in which records may be maintained to meet the requirements of a mass balance system. The definition of a site is laid down in the Commission Communication of 19th June 2010 (Official Journal C160/1) and is given as "a geographical location with precise boundaries within which products can be mixed."
2.2 **NEW**	R	A mass balance period shall be three months in duration. Where positive balances of RED compliant material exist at the end of a mass balance period records shall be maintained in order to ensure such balances can be identified and transferred to the next period.	At the end of each three month mass balance period being operated, any residual positive balance of physical RED compliant material can be 'banked' and carried over into the following time period. Records must be kept in such a way as to allow these positive balances to be identified.

		REQUIREMENT	TASCC GUIDANCE
3 SUSTAINABILITY CRITERIA REQUIREMENTS			
3.1	R	Records shall be maintained in such a way as to provide sufficient information to be passed along the supply chain to enable a GHG calculation to be undertaken in accordance with Article 17(2) of Directive 2009/28/EC.	Participants must ensure their records are sufficient to allow them to pass along the supply chain sufficient information to allow a GHG calculation to be made in accordance with Article 17(2). This information should be provided either with the goods, as part of the delivery documentation, or, where there is a specific customer requirement, in advance of the physical delivery of goods.
3.1.1		All information relating to the GHG calculation must be provided to the buyer of the goods and be clearly identifiable as to the consignment it relates to.3.2. Crops used to produce biofuels and bioliquids must not have been produced on land subject to land use change since January 2008	Participants must ensure that all relevant information required under the RED by the buyer is forwarded in respect of consignments sold for biofuel use. The information to be forwarded must include, as a minimum; name and contact details of the supplying company, feedstock type and origin (ie. NUTS 2 region), reference to previous EU recognised voluntary schemes applicable to the consignment and any relevant reference numbers/GH calculations. Such information may be supplied either on a post harvest pesticide declaration form (grain passport) or on other commercial documentation relating to the consignment in question. For EU Feedstocks the use of a disaggregated default value for cultivation is permitted if the emission for the region in which the crop was grown falls below the disaggregated default figure. Regions are classified at the NUTS2 level. It is the responsibility of the participant to determine whether the crop originates from a NUTS2 compliant region or not and the following link provides details of those NUTS2 regions which meeting the default (compliant) and those which do not (non-compliant) – http://ec.europa.eu/energy/renewables/biofuels/emissions_en.htm For NUTS2 compliant regions the required information would be an identification of the region from which crops originate together with the appropriate NUTS2 reference for that region. For NUTS2 non-compliant regions (or where specific chains require it) records must include the actual GHG calculation value which must have been provided by an EU recognised voluntary scheme.

	REQUIREMENT	TASCC GUIDANCE
3 SUSTAINABILITY CRITERIA REQUIREMENTS (continued)		
3.2 **NEW**	Crops used to produce biofuels and bioliquids must not have been produced on land subject to land use change since January 2008. A. Crops used to produce biofuels and bioliquids must not have been obtained from land with high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: a) Primary forest and other wooded land, namely forest and other wooded land of native species ,where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; b) Areas designated: i. By law or by the relevant competent authority for nature protection purposes; or ii. For the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the second subparagraph of Article 18(4) of Directive 2009/28/EC; Unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes; c) Highly biodiverse grassland that is: i. Natural, namely grassland that would remain grassland in the absence of human intervention and which maintains the natural species composition and ecological characteristics and processes; or ii. Non-natural, namely grassland that would cease to be grassland in the absence of human intervention and which is species-rich and not degraded, unless evidence is provided that the harvesting of the raw material is necessary to preserve its grassland status. B. Crops used to produce biofuels and bioliquids must not have been obtained from land with high carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:	There are specific criteria which apply to the rules on land use change. The effect of these means that any land used for biofuel production cannot have been in the following on, or after, January 2008: • Land with a high biodiversity value or • Land with high carbon stock or • Land that was peatland unless evidence is provided that the cultivation and harvesting does not involve drainage of previously undrained soil Compliance must be obtained from the supplier and recorded. Goods may be procured from land that has undergone RED compliant land use change. In such instances the annualised emission from the resultant carbon stock change must be determined and supplied through an EU recognised voluntary scheme. This information must then also be supplied up the chain.

	REQUIREMENT	TASCC GUIDANCE
3 SUSTAINABILITY CRITERIA REQUIREMENTS (continued)		
3.2 **NEW**	a) Wetlands, namely land that is covered or saturated by water permanently or for a significant part of the year; b) Continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30%, or trees able to reach those thresholds in situ; c) Land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10% and 30%, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in part C of Annex V is applied, the conditions laid down in paragraph 2 of this Article would be fulfilled. The provisions in the paragraph above shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. C. Crops used to produce biofuels and bioliquids must not have been obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of those crops has not involved drainage of previously undrained soil.	
3.3 **NEW**	**R** Records shall be maintained in such a way as to ensure the sustainability criteria for material with differing characteristics is retained when parcels are mixed.	The legislation allows parcels with differing sustainability characteristics to be mixed but only if those characteristics remain assigned to the mixture in the proportions relative to the original consignment sizes. The averaging of GHG emissions across different consignments is not permitted. Where consignments of different GHG emissions are mixed, even where they have the same sustainability criteria, the poorest GHG emission value must be applied to the whole consignment. The mass balance process operated must be capable of delivering the three points identified in the Mass Balance Requirements section above.

Module for TASCC & UFAS Merchants Schemes for RED compliance – and timetable

TASCC and UFAS Merchants are long established standards, audited to EN45011 requirements and with approximately 2,100 participants. All scheme participants must be successfully audited before being given an assured status and audits must take place on an annual basis.

The existing standards for both schemes deliver traceability in respect of food and feed safety. They are therefore well placed to take on additional requirements delivered through their adoption of a voluntary scheme under RED.

i) Qualifying Raw Material: Given the position of TASCC and UFAS Merchants members within the supply chain, the changes to deliver compliance under RED are concerned with record keeping and principally to demonstrate a mass balance assessment in line with the requirements of RED. As a first step however, scheme participants will be required to demonstrate, through the new module and in a verifiable manner, that raw materials purchased as meeting the requirements of RED, themselves, come from a recognised voluntary scheme. Participants may demonstrate this compliance through a combination of auditable routes such as contracts incorporating the specific requirement for materials sourced to be from a RED qualifying scheme or through the compilation of data sourced from the farmer or supplier information (such as a grain passport for UK produced combinable crops) in relation to deliveries.

ii) Determination of Mass Balance: Scheme participants will be required to demonstrate, to an auditable standard, a mass balance system which is able to record quantities of sustainable raw material purchased, quantities sold and quantities remaining in store. The mass balance system should clearly state the length of time applied to each accounting period and records should demonstrate how, for each accounting period, the quantity of sustainable raw material delivered is less than or equal to the quantity brought in, subject to any 'banked' amount being the positive residual balance carried forward from a previous accounting period(s).

iii) Banking: Scheme participants will need to demonstrate, within their mass balance recording system, how positive balances of sustainable raw material are identified at the end of each accounting period and that positive balance transferred into the next period.

iv) Timetable:

TASCC: The next issue of the TASCC Scheme Manual and Codes will be published in February 2014. These revised Codes were available for consultation in autumn 2013 and the proposed changes to the scheme to meet the requirement of RED have been incorporated into these revisions. The starting point for each participant will be non-compliant until such time as an audit has been carried out, any non-conformances corrected, and a certificate issued.

UFAS: The next issue of the UFAS Scheme Manual and Codes is due to be published in 2015. The proposed changes to the scheme to meet the requirement of RED will be incorporated into these revisions. AIC does however retain the ability to introduce an addendum to the Codes prior to this if appropriate. The starting point for each participant will be non-compliant until such time as an audit has been carried out, any non-conformances corrected, and a certificate issued.

European Commission Communication 2010/C 160/01
AIC has sought to provide details of how the RED module complies with the European Commission's Communication of 19th June 2010 on voluntary schemes and default values in the EU biofuels and bioliquids sustainability scheme. These details are shown below.

Assessment and recognition requirements

Documentation management

It should be a condition of participation in voluntary schemes that economic operators:

- *have an auditable system for the evidence related to the claims they make or rely on*
  The proposed new requirement to be introduced makes it a requirement of the schemes for participants to have and maintain an auditable system for the purpose of determining a mass balance calculation and for the time period in question the amount of compliant material either in or entering the store should be equal to, or more than, the quantity out.
- *keep any evidence for a minimum of 5 years*
  Existing scheme requirements state "Records must be kept for a minimum of three years, unless there are additional requirements." Auditors will therefore be given additional guidance to ensure they confirm mass balance records do meet the 5 year requirement of RED.
- *accept responsibility for preparing any information related to the auditing of such evidence*
  The requirement referenced above makes it clear that an auditable system must be maintained. The existing Scheme Manuals states that by applying for certification, the participant will comply with the requirements of the relevant codes of practice.

Audit Bodies

Audits to verify the participant's compliance with the RED requirements as listed in the RED Appendix will be conducted by the existing scheme audit bodies which are recognised by an accepted EU accreditation body (UKAS in the UK). In addition, audit bodies will demonstrate awareness of ISAE 3000 as the recognised standard for non-financial assurance which is applied to meet a broad range of activities, and have experience of conducting audits to those requirements.

Level of Assurance
All audits undertaken, including retrospective audits as part of the need to assess a sample of claims, shall be conducted to at least a limited assurance level such that the auditor can determine on the evidence presented there are no errors.

Auditor Training
Auditors will be required to demonstrate their competency to audit carbon and sustainability information to the standards required under the Renewable Energy Directive. Required knowledge of the following aspects should be demonstrated

- Knowledge of legislation,
  eg. Renewable Energy Directive
- Knowledge of assurance systems,
  their methods and assessments
- Knowledge of the requirements for, and
  assessment of, Greenhouse Gas calculations
- Knowledge of Mass Balance and
  Chain of Custody requirements
- Knowledge of the assessment for Land Use Criteria

Audit bodies will also be required to demonstrate their processes for managing auditor training and knowledge update and maintaining the professional development of auditors.

Adequate Standard of independent auditing

- *As a general rule, a voluntary scheme should ensure that economic operators are audited before allowing them to participate in the scheme*
  Any company wishing to join either TASCC or UFAS Merchants must make a formal application to join the scheme. At that point they are contacted by the certification body and arrangements made to conduct a first audit. Not until that audit has been completed and any subsequent corrective action completed and signed off, will a company become a full scheme participant.
- *For such auditing .... verification for all units concerned can be performed based on a sample of units*
  It is an existing requirement of all three schemes that all scheme participants are audited annually.
- *In addition the voluntary scheme should arrange for regular .... retrospective auditing of a sample of claims made under the scheme*
  It is an existing requirement of all three schemes that all scheme participants are audited annually and a retrospective audit of a sample of claims will be undertaken.

  For both types of audit referred to above a verifier should be selected who:

Assessment and recognition requirements (continued)

- *Is external, is independent, has the generic skills and has the appropriate specific skills*
  The requirements placed on certification and audit bodies by the requirements of EN45011, the standard to which all three schemes are accredited, means these requirements are met as a part of that existing process. As part of the ongoing training requirements, auditors will receive additional training and guidance on the appropriate specific skills related to the aspects of the introduced RED module.

Mass Balance System

- *The voluntary scheme should require verification of the mass balance system to be performed simultaneously with the verification of correctness in respecting the scheme's criteria. This should include the verification of any evidence or systems used for the purpose of complying with the requirements of the mass balance system.*
  Whilst the three schemes to which the module would be applied represents only a single link in the chain, verification of the mass balance system will be undertaken through the same independent audit that verifies compliance with the remaining appropriate criteria of RED.

  The mass balance system means a system in which sustainability characteristics remain assigned to consignments. Sustainability characteristics could include for example:

- *Evidence showing compliance with the Directive's sustainability criteria*
  This requirement is one principally for the producer of the combinable crop and therefore is met through the auditable obligation on the scheme participants to purchase compliant material from suppliers audited under a scheme recognised by the Commission under the Renewable Energy Directive.

- *A statement that the raw materials used were obtained in a way that complies with the Directive's land related sustainability criteria*
  This requirement is one principally for the producer of the combinable crop and therefore is met through the auditable obligation on the scheme participants to purchase compliant material from suppliers audited under a scheme recognised by the Commission under the Renewable Energy Directive.

- *A greenhouse gas emission figure*

- This requirement is one principally for the producer of the combinable crop and therefore is met through the auditable obligation on the scheme participants to purchase compliant material from suppliers audited under a scheme recognised by the Commission under the Renewable Energy Directive. Information from such schemes identifying the production region will allow default data from NUTS2 regions to be utilised.

- Where raw material is purchased from a region which does not have NUTS2 qualifying data, real data will have to be supplied in compliance with the requirements of the RED.

- Where data relating to transport and/or storage is generated, this should be identifiable and recorded in a form which allows it to be auditable.

- *A description of the raw material used*
  A description of the raw material purchased will be a requirement of the contract between the scheme participant and their supplier. Additionally information carried on the grain passport or similar, which relates to, and passes with, the consignment will detail the raw material. Verifying availability of this information will be a requirement of the independent audit.

- *The statement 'production has been awarded a certificate of type X from recognised voluntary scheme Y'*
  The successful completion of an independent audit results in the production of a certificate for the appropriate scheme, valid for a 12 month period and the inclusion of the participant on a searchable web based assurance checker which is hosted on the AIC website at www.agindustries.org.uk

- *Sustainability characteristics would have to include information on the country of origin of the feedstock, except for bioliquids*
  Information supplied to the scheme participant on a grain passport (used for UK produced combinable crops) or similar document will detail the **county and specific postcode** of origin of the raw material and is auditable. Additionally the contractual requirement will specify the country of origin.

Assessment and recognition requirements (continued)

- *When consignments with different (or no) sustainability characteristics are mixed, the separate sizes and sustainability characteristics of each consignment remain assigned to the mixture. If a mixture is split up, any consignment taken out of it can be assigned any of the sets of sustainability characteristics as long at the combination of all consignments taken out of the mixture has the same sizes for each of the sets of sustainability characteristics that were in the mixture. A 'mixture' can have any form where consignments would normally be in contact, such as in a container, processing or logistical facility or site (defined as a geographical location with precise boundaries within which products can be mixed).*
  The schemes have an auditable requirement for the principles of mass balance to be maintained. This will include the need to identify parcels which may have differing sustainability characteristics and ensure records show how these differing parcels are attributed to consignments delivered.
- *The balance in system can be continuous in time, in which case a 'deficit', ie. that at any point in time more sustainable material has been withdrawn than has been added, is required not to occur. Alternatively the balance could be achieved over an appropriate period of time and regularly verified. In both cases it is necessary for appropriate arrangements to be in place to ensure that the balance is respected.*
  It is an auditable requirement of the schemes for participants to show records pertaining to appropriate periods of time in order to verify that the total quantity of consignments delivered during that period was equal to or lower than the total quantity of sustainable raw material taken in during that same period, subject to the banking of any positive balance of sustainable raw material from previous periods of time (accounting periods)

Development of the AIC RED Assurance module for RED Compliance

The existing TASCC and UFAS Merchants Schemes have been in full operation for over 15 years and have approximately 2,100 companies accredited to the schemes. All scheme participants must undergo audit before they are accredited to the scheme and audited take place for all participants on an annual basis.

As both schemes are in current operation, it is proposed that the new module is introduced to the schemes to ensure raw material handled through the scheme participants retains its sustainable status and can be audited to that effect.

It is proposed that the new module will be introduced to both schemes in a 'stand alone' format as outlined in the RED Requirements document. In addition to the introduction of the standards within the module, guidance to scheme participants is aimed at assisting their understanding what is required in order to meet the additional audit requirements.

The new standards are being communicated to all scheme participants and participants will be audited against them once technical approval is achieved.

All participants will begin from a point of being non-compliant and will only be certificated against the new standards upon successful completion of the audit. Participants will subsequently have their revised assurance status indicated on the on-line assurance checker at www.agindustries.org.uk for the scheme in question.

As the schemes are reviewed, and revised codes reissued on a biennial basis, any subsequent amendments will be incorporated into these reviews. In the event of more immediate updates being required, these can be delivered via an amendment to the existing standards.

In addition to the new module being provided to scheme participants, AIC, together with the scheme audit and certification bodies, will be undertaking the necessary training of auditors to ensure understanding of the new standards and the level of information they will expect to see in scheme audits.

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