



## Certified Non-GMO by AGW Program Policy Manual

The Certified Non-GMO by AGW (CNGMO) label is the *only* Non-GMO label to offer additional assurances about animal welfare and environmental sustainability. Available to farmers, ranchers and food producers across North America, the Certified Non-GMO by AGW label guarantees food products are not only produced without genetically modified (GMO) feed, supplements or ingredients, but also come from animals raised according the highest animal welfare standards in the industry, Animal Welfare Approved.

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The senior management of A Greener World (AGW) has based its Policy Document on the guiding principles of capability, consistency, efficiency and transparency as well as on the requirements of ISO 17065. This policy provides a framework for establishing and reviewing the quality goals of the CNGMO Program. The AGW senior staff is responsible for development of policies relating to the operation of the program (see AWA Policy and Guidelines Annex 16). These policies follow the policies of AGW's AWA program.

The Policy and guidelines set out the processes and protocols for the fair and transparent operation of the CNGMO program. This document will be reviewed and amended at least annually. Any changes are announced and explained at all levels of the organization and are also publicly available.

In the event that a guideline or policy becomes unworkable or does not achieve its original objectives, interim consent to deviate may be granted by the AGW Executive Director. All staff engaged in work for CNGMO must follow the policies laid out in this document. CNGMO is a program of A Greener World.

**p1 CHAPTER ONE: STRUCTURE AND OWNERSHIP**

p1.1 Commitments

At the point of submitting an application to become Certified CNGMO, and until that application is withdrawn or denied, whether this is in the initial or in subsequent years, the applicant agrees to comply

or achieve compliance with all published standards, published program manuals, and to keep the CNGMO program immediately informed of any action or material change that could affect the applicant's ability to comply with that agreement. If a farm chooses to withdraw from the program they must provide notification in writing.

A completed application form and a signed affidavit must be on file prior to approval being granted and certificate being issued. In certain circumstances audit may take place prior to official submission of an application; however, approval cannot be granted without this submission.

Applicants further agree that the standards, as written, are acceptable and either their method of production complies with them or they are willing to make changes in order to comply. Applicants agree to allow CNGMO auditors reasonable access for the purpose of establishing and ensuring compliance with published CNGMO standards. Applicants whose farms/businesses are approved must continue to meet these commitments. All farm applicants must carry a valid certificate from the Animal Welfare Approved (AWA) program for the species in question prior to submitting an application for CNGMO.

p1.1.1 Compliance: Compliance with the program is voluntary, although some producer groups and cooperatives have decided to only work with farmers who are approved by the program.

p1.1.2 Confidentiality: AGW will hold all and any information supplied by applicants and approved farms or other businesses and groups in confidence. Information will only be shared with the consent of the party or as required by law or by contractual arrangement. In these cases the client or person concerned shall, unless prohibited by law, be notified of the information provided. Information about the client obtained from sources other than the client (e.g. from the complainant or from regulators) shall be treated as confidential.

p1.1.3 Farm and other business information: Information will not be shared with anyone outside the review process except to confirm pass, re-audit or fail. Information will only be shared with the consent of the owner.

p1.1.4 Movement of farm or other business: The CNGMO program must be informed when an applicant or approved farm or other business moves their base of operation to a new site. If a farmer carries out multiple moves within the space of 26 months or less their approved status will be reviewed.

p1.1.5 Bringing the program into disrepute: AGW reserves the right not to accept an application, not enter into a relationship, or to end any relationship with any other party that has or may bring the program into disrepute.

p1.1.6 All AGW staff, contractors, or other parties involved with the program, are required to sign a non-disclosure agreement.

p1.1.7 All AGW staff, contractors, or other parties involved with the program, are required to disclose any conflicts of interest. When conflicts of interest are identified, other staff members can be used to evaluate a specific farmer. See AWA Policy and Guidelines Annex 1 part A for the conflict of interest policy and Annex 1 part B for the register of disclosure form.

#### p1.2 Legal Status

CNGMO is a program of A Greener World. All correspondence should be addressed to:

*A Greener World*  
*PO Box 115*  
*Terrebonne, OR 97760*

#### p1.3 Statement of Intent

It is the intent of the CNGMO program to guarantee food products are not only produced without genetically modified (GMO) feed, supplements or ingredients, but also come from animals raised according the highest animal welfare standards in the industry, Animal Welfare Approved.

#### p1.4 The Team

In accordance with our recruitment procedures all of our team members are highly qualified, competent and capable of performing all duties assigned to them. All employees have detailed job specifications providing information on their functions and assigned responsibilities. This policy document and its annexes provide further guidance on how the CNGMO program works. In addition to our entry requirements, there are ongoing training programs.

##### p1.4.1 The Auditors

CNGMO audits are performed by the AWA program's staff auditors. The team of auditors is selected based on experience, skills and abilities to deal with CNGMO certification requirements.

In order to ensure that auditing skills remain up to the required standard, yearly training programs are compulsory for all auditors to attend. See AWA Policy and Guidelines Annex 2 for details of auditor selection and training.

##### p1.4.2 Impartiality

AGW is committed to impartiality in certification activities and has the overall responsibility to ensure that certification is done in accordance with CNGMO standards, policy and guidelines, and ISO 17065 requirements.

Please see AWA Policy and Guidelines Annex 1 and 28 for further information on conflict of interest and impartiality.

##### p1.4.3 Certification Staff

Certification staff must hold a Bachelor's degree at minimum, or have equivalent experience. Certification staff must demonstrate an understanding of agricultural practices, preferably alternative systems.

All certification positions are appointed by the AGW Executive Director. Certification staff members undergo a period of internal training overseen by a direct supervisor.

#### p1.4.4 Performance Reviews

All AGW team members receive annual performance reviews in accordance with the AWA Performance Reviews Procedure (see AWA Policy and Guidelines Annex 23).

### p1.5 Organizational Structure and Key Team Members

The following roles make up the structure of the CNGMO program. Direct supervisors are responsible for personnel competence requirements.

p1.5.1 AGW Executive Director: Responsible for all aspects of the program, including delegation of authority to committees or personnel to undertake defined activities on behalf of AGW; and provision of adequate resources for certification activities.

p1.5.2 AGW Director of Quality: Reports to Executive Director. Responsible for program management and administration.

p1.5.3 AGW Director of Compliance: Reports to Executive Director. Provides input into auditing and compliance work.

p1.5.4 AGW Director of Operations: Reports to Executive Director. Provides input into program operations.

p1.5.5 Auditors: Reports to the Director of Compliance and Executive Director. Responsible for on-farm audits.

p1.5.6 Technical Advisors: Report to the Executive Director. Responsible for providing advice and support as required.

### p1.6 Determining Approval for the Program

Whether an applicant becomes CNGMO will be determined by the process of an open and transparent audit of the farm. If certification is refused for any reason, the farm will be informed of the reason for this decision. CNGMO services are available to all applicants whose activities fall within the scope of CNGMO operations. Currently the CNGMO standards do not stand alone and cannot be applied in isolation. In order for products to be approved as CNGMO, the livestock they originate from must also be approved under the AWA species-specific standards. See Annex 1 for the Certified Non-GMO Process Flow Chart.

1.6.1. The audit is conducted by an AWA auditor. Any compliance issues are raised in a Corrective Action Plan (CAP) to which the farm, plant or other business must provide an adequate response before being assessed by the Approval Board. All farmers that apply to the

program are vetted to ensure they are family farmers. Once they have passed that criteria, all are treated equally. There are no financial gains from promoting particular farms or products.

1.6.2 The program will allow farmers, producers, cooperatives, and restaurants to use the CNGMO label and seal on egg, dairy, natural textiles, and meat products that have come from animals raised on an approved single farm or a network of farms.

1.6.3 The seal may be used on final processed products when all operations in the chain from farm to production of final packaged produce are certified by CNGMO and AWA. If not all operations are certified, the seal may only be used on final processed products with the written consent of the Executive Director, and provided that it can be shown that any animal product comes from only CNGMO farms with a current passed audit.

#### p1.7 CNGMO Approval Program Attributes

p1.7.1 The only Non-GMO, third-party certification program offering additional assurances about animal welfare and environmental sustainability.

p1.7.2 United States Department of Agriculture (USDA) approved.

p1.7.3 The only pasture- and range-based program.

p1.7.4 Food Safety and Inspection Service (FSIS) and USDA labeling support provided by our staff.

p1.7.5 Exclusively for independent, family farmers, producer groups and cooperatives of family farmers.

CNGMO also offers the points below through their dedicated marketing and outreach team:

p1.7.6 Free marketing support.

p1.7.7 Free technical support.

#### p1.8 Program Terms and Definitions

See CNGMO on the program website at [www.certifiednonge.org/standards/](http://www.certifiednonge.org/standards/).

#### p1.9 Fees

There is currently an \$81 application fee for the CNGMO program plus a \$550 audit and expense fee. Lab testing fees will also be charged where applicable. Testing needs will be determined by the risk assessment flow chart (See Annex 2).

CNGMO reserves the right to require a farmer to contribute to the cost of staff members' time and travel under the following circumstances:

1.9.1 Where re-audit is required to verify that any compliance issues have been rectified before approval to use or continue to use the seal or label is granted.

1.9.2 Where a visit or audit has to be rearranged due to the farmer being absent or unavailable when the auditor arrives at the previously agreed time and date; or when the farmer cancels a visit or audit at short notice without good reason (see also suspension and termination section 3.4.1).

p1.10 Auditor and Agent Status

All auditors and agents are directly contracted by AGW. Auditors and agents do not make the final decision on whether an applicant is accepted into the program.

p1.11 Processes or Production Claims

Applicants who are accepted into the CNGMO program are responsible for submitting their label claim to the appropriate authority before marketing or supplying products using the AWA seal or label.

p1.12 Approving Authorities

The program is approved by the USDA.

p1.13 The Standards

The standards have been developed over a period of time by a group of experts. These include scientists, farmers and farm animal welfare experts from around the globe. The standards will be reviewed annually by the Standards Board. A review of an individual standard by the board may occur outside the annual review if new information on its implementation makes this a necessity.

*Note: See 1.14.1 for more information on the Standards Board*

p1.14 Setting and Publishing of Standards

The “published standards” are the most up-to-date standards and are those that are available at **[www.certifiednonge.org/standards](http://www.certifiednonge.org/standards)**. Standards are published and publicly available and will be reviewed annually by the Standards Board. Farmers or groups who have been accepted into the program will be notified of changes in standards via the website or by request can be sent changes by mail. Reasonable consultation time will be given.

p1.14.1 Terms of Reference - The Standards Board:

p1.14.1.1 Sets the CNGMO standards.

p1.14.1.2 Annually reviews standards.

p1.14.1.3 Evaluates standard review requests as these are submitted.

p1.14.2 Membership of the Standards Board

p1.14.2.1 AGW Executive Director.



p1.14.2.2 AGW Technical representative: responsible for matters relating to achievability of the standards.

p1.14.2.3 Producer Representative: responsible for representing the farmer's perspective. (As required.)

p1.14.2.4 Production Expert: responsible for providing impartial opinion on subject discussions. (As required.)

p1.14.2.5 Secretary: AGW Director of Quality: responsible for minutes, agendas and correlations of required documentation.

p1.14.2.6 Invited representative from species or sector under discussion. (As required.)

p1.14.2.7 Authority to appoint and terminate members of the Standards Board lies with the AGW Executive Director.

#### p1.14.3 Meetings of the Standards Board

p1.14.3.1 The board meets as required and at least annually.

p1.14.3.2 The board can if necessary convene by phone and email.

p1.14.3.3 The board can seek and obtain any information that enables it to affect a more informed decision. These representations can be made in person or by document.

p1.14.3.4 Decisions of the board are only binding when the meeting is in quorum.

#### p1.14.4 Quorums

At minimum a quorum for standards change must include the AGW technical representative, the AGW Executive Director and the secretary. In addition either the producer representative or production expert may be present. Wording may be modified without a representative for clarity or consistency.

A period of consultation and compliance must be granted when any changes to standards are made. Farms are checked that standards have been implemented at the next scheduled audit.

#### p1.14.5 Terms of Reference – The Approvals Board

##### The Approvals Board:

p1.14.5.1 Reviews and decides on farm approvals.

p1.14.5.2 Reviews critical and cumulative non-compliances.

p1.14.5.3 Reviews complaint reports.

p1.14.5.4 Reviews and decides outcome of removal of farms from the CNGMO program.

#### p1.14.6 Membership of the Approvals Board

p1.14.6.1 AGW Executive Director.

p1.14.6.2 AGW Director of Quality: responsible for presenting non-compliance reports.

p1.14.6.3 A third member will be nominated to cover in case of a recusion or a split decision.

p1.14.6.4 A member of the approvals board cannot vote on an audit they have carried out.

p1.14.6.5 Authority to appoint and terminate members of the Approvals Board lies with the AGW Executive Director.

#### p1.14.7 Meetings of the Approvals Board

p1.14.7.1 The board meets as required and at least monthly.

p1.14.7.2 The board can if necessary convene by phone or email.

p1.14.7.3 The board can seek and obtain any information that enables it to affect a more informed decision. These representations can be made in person or by document.

p1.14.7.4 Decisions of the board are only binding when the meeting is in quorum.

#### p1.15 Application for Standard Amendments or Modifications

p1.15.1 Anyone associated with the program can submit a suggestion or request for a standards amendment.

##### p1.15.2 Process

The standards amendment form (see AWA Policy and Guidelines Annex 5 part A) must be completed and submitted to the AGW office. The amendment will be assessed against current records and if it has not been previously discussed and has merit (see standards amendment flow chart AWA Policy and Guidelines Annex 5 part B), it will be forwarded to the Standards Board for consideration. Reasonable consultation time will be given.

#### p1.16 Approval

AGW will grant the use of its CNGMO seal and label to the applicant following a review of submitted documentation and a satisfactory farm audit.

p1.16.1 The approval to use the seal and label is granted from the date given in the formal notification from the office of AGW, until such time as the license is revoked in writing or 18 months has passed, whichever is the shorter period of time. (See also p3.2.3.3.)

P1.16.2 The seal and label can only be displayed on a product that is approved by the program and is compliant with all state and federal regulations.

p1.16.3 The approved farm or group can only use the seal and label on livestock products derived from animals that originate from an audited farm that has been audited for the species subject to the claim.

p1.16.4 The approval can be revoked at any time. The approved farm or group is responsible for ensuring continued compliance with the published standards. The published standards will be those on the CNGMO website and it is the farmer's responsibility to ensure that they keep up to date with these.

#### p1.17 Appeals

If the farmer or group disagrees with the result of an audit or Approval Board's decisions they can submit an appeal to the Appeals Board, which will be formed to hear the appeal.

The appeal will be restricted to an interpretation of the standards or the process and not the material standard. By joining the program the farmer agreed that the published standards were acceptable – see 1.1 – so an appeal cannot be launched on the basis of disagreement with a particular standard.

##### p1.17.1 Composition of the Appeals Board

p1.17.1.1 An AGW representative not involved in the initial decision or any of the related certification activities.

p1.17.1.2 A recognized expert in the production system being considered not involved in the initial decision or any of the related certification activities.

p1.17.1.3 A third member not involved in the initial decision or any of the related certification activities will be nominated to cover in case of a recusal or a split decision.

p1.17.1.4 Members of the Appeals Board must not review an appeal for a farm for which the member has been employed or provided consultancy in the previous two years.

##### p1.17.2 The Appeals Process

The farmer or group submits an Appeal Form (see AWA Policy and Guidelines Annex 7) to the AGW office. The Director of Quality formally acknowledges receipt of the appeal.

The appeal must be arranged within 30 days of receipt of the Appeals Form unless agreed by all parties.

The appeal may be conducted in person, in written form or on the telephone.

The appellant may provide witnesses or experts or submit reports or other evidence from witnesses or experts to make representations or appear in person—all at their own cost.

In all matters the Board’s decision will be final and the farmer will have no further right of appeal.

**p1.18 Internal Audits**

AGW carries out annual internal audits. An annual plan will be reviewed in order to ensure that during a three-year cycle, audits of every policy and procedure are carried out and delivery of the same is reviewed. The Executive Director will be responsible for preparing the annual plan and ensuring delivery (see AWA Policy and Guidelines Annex 19). The internal audit will be conducted in conjunction with the AWA program’s internal audit.

**p1.19 Management Reviews**

The purpose of a Management Review is to ensure the continuing stability, adequacy and effectiveness of AGW’s quality management system. This means that once per year goals are evaluated against performance, results of Internal Audits are considered, any complaints against our services are investigated and the general state of organizational affairs are evaluated (see AWA Policy and Guidelines Annex 20). The management review will be conducted in conjunction with the AWA program’s management review.

**p1.20 Control of Approval**

Unfortunately it sometimes happens that people make false claims relating to their status of approval. In order to protect the product of the approval system (our seal/label) and the value it has for farmers and other businesses, we control the misuse of CNGMO status.

**p1.21 Document and Record Control**

In making sure that all team members know what is expected of them and in order to ensure that everyone always has access to the latest, properly approved version of a document, there is a procedure that defines the processes, requirements and responsibilities for document control (see AWA Policy and Guidelines Version Control Policy, Annex 18).

“Records” relate to information gathered and generated during the course of the approval process relating to a specific farm or other business. Records are retained for a minimum of three years from the last activity on file. Digital copies of audits, confidential files, and correspondence are stored on a secure server accessed by authorized compliance personnel only. The Director of Quality manages and maintains records and releases information to auditors as appropriate.

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**p2 CHAPTER TWO: BECOMING LICENSED**

#### p2.1 Certified Non-GMO

The Certified Non-GMO animal feeding category can only be awarded when combined with one or more categories from the Certified AWA program.

#### p2.2 Application

p2.2.1 A farmer applicant to the CNGMO program must be an adult.

p2.2.1.1 A minor, as defined by the state in which the farm business operates, may apply to the program as long as a parent or legal guardian co-signs the farm application form.

p2.2.1.2 If the farmer is a minor, an appropriate farm management mentor must be appointed. The mentor may be a parent or other advisor.

#### p2.2.2 Initial application

The Director of Quality review the submitted application for completeness and compliance with published standards, and if necessary will seek further information from the applicant.

#### p2.2.3 Application withdrawal

At any time the applicant can withdraw from the process for whatever reason by giving notice to the program.

#### p2.2.4 Audit arrangements

The Director or Quality will inform the AWA program when an audit should be arranged. Auditors will be assigned based on availability and/or geographical location.

#### p2.2.5 Changes in application

Any farmer wishing to add species to their application must submit a new farm application. Any farmer wishing to remove a species from their application must submit a request in writing to the Director of Quality.

#### p2.2.6 Changes in circumstance

Substantial change(s) in location (see also p1.1.4), ownership or control of an approved farm may require a new application to be submitted. The new application will be reviewed with the history of the previous operation in mind.

#### p2.2.7 Dormant farms

If a farm submits an application but does not respond to the Director of Quality or other program communications it will be marked dormant. If the farm subsequently contacts the program they may be required to submit a new application.

### p2.3 Review of Status

#### p2.3.1 Notification of audit

CNGMO will notify the producer of the date the next audit is due. Submission of an annual farm application is not required.

#### p2.3.2 Application withdrawal

At any time the applicant can withdraw from the process for whatever reason by giving notice to the CNGMO program.

#### p2.3.3 Audit arrangements

The AWA Eligibility Coordinator will allocate the audit under guidance from the AGW Director of Quality. The auditor will liaise with the farmer to organize the audit visit. The auditor will be assigned based on availability and/or geographical location. The auditor will report any changes prior to scheduling the audit.

p2.3.4 Reported changes will be reviewed by the Director of Quality or a nominee prior to scheduling the audit.

p2.3.5 An auditor may not carry out three consecutive audits on the same farm.

### p2.4 Audit Outcome

#### p2.4.1 Information on day of audit

Auditors will inform the farmer verbally or in writing on the day of the visit their recommendation for the outcome of the audit.

Applicants must note that the final decision for approval does not sit with the auditor. Use of the CNGMO seal or label can only be used after formal notification of an audit pass from the CNGMO program (See also section 1.11).

#### p2.4.2 Areas of operation that do not comply

At the end of the audit visit the auditor will provide the farmer with the details of any areas of the operation that do not comply with the standards.

#### p2.4.3 Compliance form

After the AGW Director of Quality receives the audit report, the compliance form will be issued. This will detail any non-compliances and critical non-compliances that were identified at audit. The farmer must complete and return this form within one month of receipt providing

information on the action that has or will be taken to address compliance issues and the time scale for this.

p2.4.4 Using the label when non-compliances have been issued

A farmer or group that has been previously accepted into the CNGMO program may be allowed to continue to use the seal or label while action is taken to rectify any non-compliances. The action taken will be assessed at the next audit or sooner if necessary.

p2.4.5 Repeated non-compliance

Any non-compliance that has not been addressed and is noted at two audits in a row will be upgraded to a critical non-compliance.

p2.4.6 Critical non-compliance

Critical non-compliances may result from failure to meet specific key standards or following a repeat of previously noted non-compliances (see 2.4.5).

p2.4.7 Use of seal or label with critical non-compliance

If a critical non-compliance is noted at an application audit, the use of the seal or label cannot be approved.

If a critical non-compliance is noted at a review audit, the use of the seal or label may be suspended from the date of issue of the compliance form.

In this situation the seal or label cannot be used until evidence is provided that action has been taken to rectify the critical non-compliance. A re-audit may be required before approval to use or continue to use the seal or label is granted.

p2.4.8 Major critical non-compliance issues

In some cases the critical non-compliance issues on the farm may be so great that CNGMO decides not to offer the option of compliance forms and may decline to allow the farm to enter or remain in the program.

p2.4.9 Repeated critical non-compliances or new critical non-compliances found at re-audit

If at re-audit a farm is found not to have corrected a critical non-compliance, and therefore to have broken their agreed compliance action plan, they may be suspended from the program. If a farm is found to have changed their management between audits in such a way as to bring themselves into critical non-compliance, and therefore to have broken their agreement with the program under section 1.1 of this document and also the CNGMO standards, they may also be liable for suspension.

p2.4.10 Refusal of entry to the program

CNGMO reserves the right to refuse entry to, or to remove a farm from the program, at any time. At such a time CNGMO retains the right to inform any producer member or processor about any suspension or removal from the program. If a farm is refused entry or removed from the program they will be told the reason for this decision. Farms may be refused entry for reasons including, but not limited to:

- p2.4.10.1 a history of animal abuse;
- p2.4.10.2 a history of dishonesty with regard to the program;
- p2.4.10.3 if the farm demonstrates or has demonstrated a lack of compatibility with the program;
- p2.4.10.4 if the farm is found during the eligibility screening to be non-compliant with the standards and/or is unwilling to come into compliance with the standards;
- p2.4.10.5 if the farm's missions or operations are not compatible with program.

CNGMO maintains a policy of non-discrimination and does not refuse entry based on other factors.

#### p2.4.11 Cooperatives and producer groups when a critical non-compliance is issued

If a farm within a cooperative or a producer group is issued with a critical non-compliance, the cooperative or producer group may continue to use the CNGMO seal or label, if this has been previously approved. CNGMO may require that produce from the farm with the critical non-compliance is excluded from the group's supply chain, marketing or sales.

#### p2.4.12 When can the seal or label be used

Following audit and acceptance of the actions detailed on the compliance form, the farm or group may supply or market approved food products with the CNGMO seal or label.

#### p2.4.13 Response times

The response times required of the farmer for CAP and other information as shown in this document are based on the farmer being able to use electronic communication. If a farmer needs to receive communication via mail, the CNGMO program may choose to extend the deadlines for response to take into account mailing time.

#### p2.4.14 Dormant farms

If a farm that has been audited for the first time does not respond to program communications regarding compliance or any other issues, it will be marked dormant. If the farm subsequently contacts the program they may be placed back into the compliance and approval cycle or they may be required to undergo a new audit depending on how much time has passed since the original audit.

### p2.5 Showing, FFA and 4H



p2.5.1 If a CNGMO farmer supplies an animal from an approved herd or flock for FFA or 4H activities the animal can only be sold under the CNGMO label, or returned to a CNGMO herd or flock if it is managed to CNGMO standards throughout its life.

p2.5.2 If a CNGMO farmer supplies an animal from an approved herd or flock for FFA or 4H activities and the animal is not managed to CNGMO standards throughout its life—OR the family member of a CNGMO farmer buys an animal for FFA or 4H activities—the owner of the animal and the CNGMO farmer must be able to show separation between the management of the CNGMO herd or flock and the FFA or 4H animal.

p2.5.3 The CNGMO seal or label cannot be used on any showing equipment or anything else association with an animal that is not managed to CNGMO standards.

## p2.6 Cooperatives/Producer Groups

### p2.6.1 Definitions

p2.6.1.1 A cooperative is a group of farmers who work together and market all their produce under one name or brand, mutually benefiting from the profits.

p2.6.1.2 A producer group is a group of farmers who work together but market some of their produce independently of other farmers in the group.

### p2.6.2 Responsibilities

p2.6.2.1 In a cooperative, an individual must be appointed to liaise with CNGMO to ensure compliance with standards and facilitate communications as well as operate a program to ensure the integrity of the CNGMO label.

2.6.2.2 In a producer group, each farmer will be responsible for the liaison and communication as well as the integrity of the supply chain. An individual can be appointed at the discretion of the group.

2.6.2.3 If the action or inaction of the named individual responsible for communication with CNGMO from a cooperative or a producer group causes that cooperative or producer group to fall out of compliance CNGMO may take action as follows:

- Suspend or terminate the group or cooperative.
- Suspend or terminate individual farmers within the group or cooperative.
- Suspend or terminate the named individual.

The action taken will depend on the action or inaction of the named individual and degree of severity of the non-compliance. The recommendation to suspend or terminate will be proposed by the Executive Director or their delegated authority. The decision to put on suspend or terminate will be taken by the Executive Director or their delegated authority or the Approval Board and will depend on the severity of the issue.

#### p2.6.3 Application process

p2.6.3.1 In a cooperative it is only necessary for one person to fill out the application with details of the entire group.

p2.6.3.2 In a producer group, each farmer will be responsible for applying to the CNGMO program.

#### p2.6.4 Audit arrangements

p2.6.4.1 In a cooperative, the AWA Eligibility Coordinator will allocate the audit and the auditor will liaise with the appointed person to schedule audits and visits.

p2.6.4.2 In a producer group each farmer will liaise with the auditor for the audit visit. An individual can be appointed at the discretion of the group.

#### p2.6.5 Audit outcomes and decisions

p2.7.5.1 In a cooperative the auditor will give the farmer and the appointed person the result of the audit.

p2.7.5.2 In a producer group the auditor will give the farmer the result of the audit. With the consent of the farmers, their audits can be shared with an appointed person.

#### p2.6.6 Corrections of minor non-compliances

p2.6.6.1 In a cooperative the appointed person, and CNGMO as required, will work with the farmer to complete the corrective actions.

p2.6.6.2 In a producer group the farmer will work with CNGMO or an appointed representative to complete corrective actions.

#### p2.6.7 Corrective actions process

p2.6.7.1 In a cooperative any suspended farm must be excluded from the cooperative's CNGMO branded supply or the entire cooperative will lose this status. The suspended farm must submit a Corrective Action Plan to CNGMO.

p2.6.7.2 In a producer group the individual farmer with critical non-compliances must submit a Corrective Action Plan. An appointed representative may also support the individual farmer.

## p2.6.8 Records and documentation

p2.6.8.1 In a cooperative the appointed person will keep records adequate to allow an CNGMO auditor to trace the source of all meat and other livestock products being sold under the CNGMO label. This is in addition to the farms' normal farm records.

p2.6.8.2 In a producer group each farmer will keep the records required by the standards.

## p2.7 Transport and Storage of Finished Products

### p2.7.1 Identification

All meat or other items being marketed under the CNGMO label must be clearly identified:

p2.7.1.1 On finished product by the CNGMO seal.

p2.7.1.2 On the wrapper or box containing finished product a clear denomination of the products status as CNGMO must be clearly and indelibly marked.

### p2.7.2 Records

The farmer will be responsible until the point of change of ownership for keeping records that would allow a competent auditor to trace the meat or other livestock products.

### p2.7.3 Audit arrangements

Wherever possible the farmer must facilitate access to records and facilities that transport and store finished product.

## p2.8 In-Store Handling and Storage

### p2.8.1 Responsibilities

As far as is possible the farmer or cooperative must have records to show the auditor the source and status of the CNGMO meat or other livestock products.

### p2.8.2 Records and documentation

As the CNGMO program is a production claim the store must be able to satisfy a USDA inspector as to its source.

## p2.9 Further Processing and Added Value

### p2.9.1 Responsibilities

If the further processing facility is not audited and certified by AGW, the farmer must ensure that sufficient and accurate documentation is kept to demonstrate to the auditor that there is a balance between basic CNGMO product going in and the CNGMO further processed product coming out.

p2.9.2 Records and documentation

If the further processing facility is not audited and certified by CNGMO the following records must be kept:

p2.9.2.1 Delivery notes of meat to the further processor must be kept.

p2.9.2.2 Delivery notes must show that meat is accredited to the CNGMO program.

p2.9.2.3 Invoices showing the weight of finished product must be available for inspection.

p2.9.2.4 Records must be available to track back the sources of multi-ingredient products if these have come from a number of farms approved under the CNGMO program.

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**p3 CHAPTER THREE: AUDIT AND COMPLIANCE**

p3.1 ----- Not Allocated -----

p3.2 Announced Audits

p3.2.1 Arranging announced audits

An announced audit will be arranged by liaison between the farmer and the auditor and will be held on a time and date to suit the farmer. See p2.2 and p2 for further information.

p3.2.2 Response to application

CNGMO will respond to an application to join the program within 21 days.

p3.2.3 The farm and livestock audit

The audit will be carried out by an AWA auditor with a maximum of 18 months between audits.

p3.2.3.1 The audit cycle can be amended in cases of force majeure (unforeseeable circumstances beyond anyone's control) such as natural disaster or serious injury or illness of the farmer.

p3.2.3.2 The audit cycle may also be amended by agreement in cases of major farm infrastructure change such as new facilities or introduction of a new species to be audited when audit in the normal cycle would necessitate re-audit within a few months to review the new situation.

p3.2.3.3 The audit cycle may also be amended where farms with seasonal production of one species also have other species that must at some point be audited outside of the

production cycle of the seasonal species. If there are no major non-compliance issues with the seasonal species, the seasonal species may not be seen at one audit and retain certification. The seasonal species must be audited at the next audit.

#### p3.2.4 The producer group audit

The audit of each individual farm will be carried out by an AWA auditor.

#### p3.2.5 The cooperative audit

The audit will be carried out by an auditor who will also audit the group record kept by the “Appointed Person” to ensure traceability is maintained.

#### p3.2.6 Further processing

If the further processing facility is not audited and certified by CNGMO, an auditor may arrange to inspect records of delivery and collection to match volume at operations where further processing is carried out.

#### p3.2.7 Transport and storage

An auditor may arrange to inspect transport and storage of AWA livestock or products.

#### p3.2.8 Storage and in-store handling

An auditor may arrange to inspect storage and in-store handling of AWA products.

### p3.3 Spot Audits

3.3.1 All areas of the supply chain from production to retail may be subject to spot audit visits. See AWA Policy and Guidelines Annex 22 for the Policy for Spot Audits.

### p3.4 Suspension and Termination

#### p3.4.1 Suspension and termination of farms

A farm may be suspended or terminated from the program in instances that may include the following:

p3.4.1.1 the documents, application or any information supplied to or audited by CNGMO are found to be inaccurate, incomplete or otherwise misleading.

p3.4.1.2 as a result of any act or omission, the farm fails to comply with the CNGMO standards.

p3.4.1.3 the farm refuses to allow an audit by CNGMO.

p3.4.1.4 the farm is absent on the agreed day of audit or cancels an audit without reasonable cause within seven days or once the auditor has already travelled to the area—whichever is longer.

p3.4.1.5 the farm brings or may bring the program into disrepute.

p3.4.1.6 the farm fails to demonstrate competence in farm management.

p3.4.1.7 failure to respond to communication and/or requests for information.

#### p3.4.2 Farm removal of species

p3.4.2.1 If a farm removes a species from CNGMO certification, either voluntarily or involuntarily, but is still approved or seeks approval for other species, the Approvals Board reviews the certification status across the whole farm and all species.

p3.4.2.2 The Approvals Board reserves the right to terminate the farm from the program entirely. The recommendation to suspend or terminate will be proposed by the Executive Director or their delegated authority. The decision to suspend or terminate will be taken by the Executive Director or their delegated authority or the Approval Board and will depend on the severity of the issue.

#### p3.4.3 Suspension

In the event a farm is put suspended from the program the farmer will be informed and provided the reasons for it by telephone or email, followed up by written notification. The farmer will be given one month to respond with a Corrective Action Plan (CAP). The decision to suspend or terminate will be taken by the Executive Director or their delegated authority or the Approval Board and will depend on the severity of the issue.

During suspension the farmer can continue to use the CNGMO label and seal on existing leaflets and labels and on their website, unless otherwise notified by the Approval Board. However, they cannot actively market their approval under the CNGMO program by entering into new advertising agreements, using new labels, producing new literature or new press releases.

If no response is received within one month the farm will be terminated from the program.

#### p3.4.4 Termination

In the event a farm is terminated from the program the farmer will be informed of the termination and the reasons for it by telephone or email, followed up by written notification.

From the date of being informed the farmer must cease to use the CNGMO label and seal on any and all products and marketing information. This includes but is not restricted to product labels, leaflets, banners, press releases and websites.

Product that has already been packed and labeled with the CNGMO seal may still be sold provided the CNGMO seal or label is removed, covered or otherwise obscured.

On suspension or termination of approval CNGMO may inform parties who may have an interest in the termination and the reasons for it. These parties may include competent authorities, other certification bodies, statutory bodies and others.

Following notification of termination a farm must wait for a minimum of six months before reapplying to the program.

The farmer may appeal the decision – see section 1.18. During the period of appeal all terms of termination noted above—including an end to the use of the CNGMO seal—must be met.

A termination may be rescinded when information subsequently comes to light that might otherwise have stopped the farm from being terminated.

#### p3.4.9 Administrative Termination

A farm may be terminated from the program under administrative termination in instances that may include the following:

3.4.9.1 A previously approved business moves site and cannot get the new site ready for audit or review within a reasonable time.

3.4.9.2 Major changes occur at an approved business such as acquisition of new land, buildings or other facilities which cannot be prepared for audit or review within a reasonable time.

Administrative termination cannot be requested by a farm which cannot or will not come into compliance with CNGMO standards. The recommendation for administrative termination will be proposed by the Executive Director or their delegated authority. The decision to terminate will be taken by the Executive Director or their delegated authority or the Approvals Board.

A farm that has been subject to administrative termination is exempt from the requirement of clause 3.4.4 that six months must elapse before reapplication to the CNGMO program. Administrative termination holds no negative connotation for the business concerned.

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## **p4 CHAPTER FOUR: PROGRAM PROMOTION AND PUBLIC RELATIONS**

CNGMO asks that farmers meet the following guidelines:

### p4.1 Use of Label and Seal

Once a farm has been approved as part of the CNGMO program it may use the appropriate label or seal and any other promotional material available from the program office, until such time the farm is informed in writing of its removal or termination from the program.

Continuing to use a label or seal after receipt of a written instruction that the farm has been removed or suspended from the program may result in legal action being taken.

Use of the CNGMO seal relating to products that cannot be certified as CNGMO, but may be associated with CNGMO production, will be considered on a case-by-case basis. In approved cases, where the CNGMO seal is used to promote such products, the seal must be accompanied by the text "Use of this product is compliant with the CNGMO program when used in accordance with the CNGMO standards."

#### p4.2 Appearance of Seal

The CNGMO seal must be reproduced from original artwork. Please contact AGW for a copy of the appropriate seal(s). The seal must appear:

- complete and upright
- in proportion to the product description
- clearly visible
- clear and legible over the whole of a background, for example if used over a photograph.

The seal should be:

- on the main face of the label or packaging.

The seal must not appear:

- against a background that affects its legibility
- incomplete
- at an angle
- in different colors (without prior written consent)
- with a different font or typeface.

#### p4.3 Use of the Seal by Those who are not Directly Accredited

In certain circumstances those who are not directly approved by CNGMO but who are marketing CNGMO products may use the CNGMO seal. Please see AWA Policy and Guidelines Annex 13 and Annex 27 for further details.

#### p4.4 Reproduction of the CNGMO Certificate

p4.4.1 The CNGMO certificate must be reproduced in its entirety without alteration.

p4.4.2 Certificates will be issued for a period of 18 months.

p4.4.3 A valid certificate will be signed by the Executive Director, Director of Operations or the Director of Quality.

#### p4.5 Press Contact



All inquiries requesting information about the program should be referred to the Executive Director at the following address:

AGW  
PO Box 115  
Terrebonne, OR 97760

or by email at [info@agreenerworld.org](mailto:info@agreenerworld.org).

#### p4.6 Conferences

From time to time farmers may be asked to attend a conference to promote the program. AGW will cover reasonable expenses.

#### p4.7 On Farm Tours and Visits

CNGMO may ask farmers to show or demonstrate the practices they use to other farmers or the press and media.

#### p4.8 Information

CNGMO will not use information about a specific identifiable farm or group, or management practices relating to that identifiable farm or group without the prior permission of that farm or group. Examples could be information provided as case studies for other farms, or media briefings.

#### p4.9 Policy for Promoting Business or Individuals at Events AGW is Attending or Organizing

Statement of intent: This policy affects approved businesses or individuals such as:

- Farms
- Farmers
- Farmer/producer groups

In order to make best use of resources AGW will assess potential businesses or individuals that could be supported/promoted at events and will work with whichever is the best fit for the event.

In order to make the assessment AGW will use the following criteria.

1. Is the business or individual in good standing with CNGMO?
2. Is the business or individual capable of supplying the potential buyers/markets at the event?
  - a. Is the business or individual retail ready? (Are the relevant labeling, licensing and processing systems in place to meet the event audience needs and is the business or individual able to supply sufficient product quantity for the potential customers)
  - b. Are there systems in place to monitor quality at the potential volume?
  - c. If the potential for market growth is a factor is there an ability to meet rising demand? (Scalable supply chain)
3. Is the business or individual local to the event/local to the demand that is likely to arise from the event

4. Has CNGMO promoted the same business or individual before—are CNGMO over promoting a particular business or individual?
5. What is the impact on CNGMO (best use of our resources)?

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## **p5 CHAPTER FIVE: COMPLAINTS**

CNGMO takes complaints seriously. In the unlikely event that an unresolved concern does arise, the program has ensured that a process is in place to resolve it.

### **p5.1 First Recourse**

In the first instance all complaints should be referred to the AGW Executive Director (see AWA Policy and Guidelines Annex 21).

### **p5.2 Appeal and Adjudication**

If the complaint is not resolved by the AGW Executive Director the matter can be referred to the Approvals Board for determination and the subsequent appeals procedure can be implemented. No person must review a complaint for a farm for which the person has been employed or provided consultancy in the previous two years.

### **p5.3 Complaints and Appeals from the Farm**

Complaints related to the result of an audit must be referred to the appeals process. (Refer to section 1.17 on appeals.)

### **p5.4 Complaints Against the Farm**

Most complaints or concerns about farms and farming practices come from misunderstandings. Communication with customers, the local community and others are the key to avoiding such situations. To help CNGMO to help farmers we strongly recommend that we are contacted about any complaints received.

p5.4.1 CNGMO must be informed of any complaints against the farm relating to issues that affect certification.

p5.4.2 A complaints record relating to complaints about CNGMO products or management must be maintained and be available at annual inspection.

### **p5.5 Legal Action against the Approved Farm**

p5.5.1 The CNGMO program must be informed immediately of any legal action that is taken against the approved farm or farmer relating to issues that affect certification.

p5.5.2 The CNGMO program must be informed immediately if the farmer or any farm workers are or have ever been knowingly convicted of offences relating to animal cruelty.

p5.5.3 The farm's approval may be suspended pending investigation if animal cruelty allegations or charges are brought against anyone working on the approved farm.

p5.5.4 The CNGMO program must be informed immediately of any state or federal activities that may affect the integrity of the seal.

#### p5.6 Actions when an Approved Farm/Farmer does not Inform CNGMO of Relevant Legal Action

p5.6.1 If the CNGMO program discovers or is informed by a third party that the approved farm or farmer is or has been the subject of legal action relating to activities that affect certification, the following actions will be undertaken:

p5.6.1.1 All relevant information will be presented to the Executive Director for review and assessment.

p5.6.1.2 Once the case has been assessed, the Executive Director will present the facts at Approvals Board with a recommendation of further action.

p5.6.1.3 Actions following review may include: a record on the farm's file with no further action; a letter to the farm requiring them to report any further legal actions against them; suspension of the farm from the program and termination of the farm from the program depending on the severity of the problem.

p5.6.1.4 The Approvals Board will decide the final action

#### p5.7 Response to complainants

p5.7.1 The complainant will be informed of the results of their complaint whenever possible. (See also AWA Policy and Guidelines Annex 21.) The response will be one of the following options:

p5.7.1.1 CNGMO has reviewed the complaint and found it to have no merit.

p5.7.1.2 CNGMO has reviewed the complaint and found it unproven, but will continue to monitor the situation.

p5.7.1.3 CNGMO has reviewed the complaint and found that it has merit. The farm in question has been placed into special measures to resolve the issue.

p5.7.1.4 CNGMO has reviewed the complaint and found that it has merit. The farm in question has been terminated from the program.

p5.7.2 Due to AGW's confidentiality protocols it is not possible to share the specifics of a complaint investigation with the complainant unless the investigated farm agrees that information can be shared.

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## **P6 CHAPTER SIX: SUBCONTRACTS**

CNGMO utilizes external laboratories for Non-GMO testing validation.

### **p6.1 External Laboratory Requirements**

CNGMO will subcontract genetic testing to third-party laboratories.

### **p6.2 Subcontracting to Non-Independent Bodies**

CNGMO will not subcontract laboratory testing to non-independent bodies. CNGMO will maintain commitment to ensuring impartiality with third-party laboratories. (See also 1.4.2.)

### **p6.3 Laboratory Contracts**

p.3.1 Each third-party laboratory will have a legally binding contract with CNGMO.

p6.3.1.1 The contract will, at minimum, include provisions for conflict of interest and confidentiality. (See also 1.1.2.)

p6.3.1.2 The contract will require a testing method that provides at least 90% confidence in quantifying genetically modified organisms to the threshold level. The threshold levels will be as follows: 1) seeds 0.1% 2) animal feeds 0.9% 3) animal supplements 0.9%.

### **p6.4 Subcontracting Responsibilities and Verification**

p6.4.1 CNGMO is responsible for all activities subcontracted to third-party laboratories.

p6.4.1.1 CNGMO will maintain records of each sample submitted and a chain of custody document for the associated sample. Chain of custody documents will be signed by the farmer during the CNGMO farm audit.

p6.4.2 CNGMO requires each third-party to provide a record of their ISO/IEC 17025 accreditation.

p6.4.3 Laboratories will be reviewed and approved by the Director of Quality and Executive Director of AGW prior to entering contractual agreements. Laboratory qualifications will be reviewed for ISO/IEC 17025 accreditation, per ISO/IEC 17065 requirements. Certificates of

accreditation must indicate the scope of testing is applicable to the samples being tested. Certificates of accreditation must be provided to CNGMO at minimum, annually.

p6.4.4 CNGMO will maintain a list of approved third-party laboratories.

p6.4.5 CNGMO will implement corrective action procedures for any breach of contract.

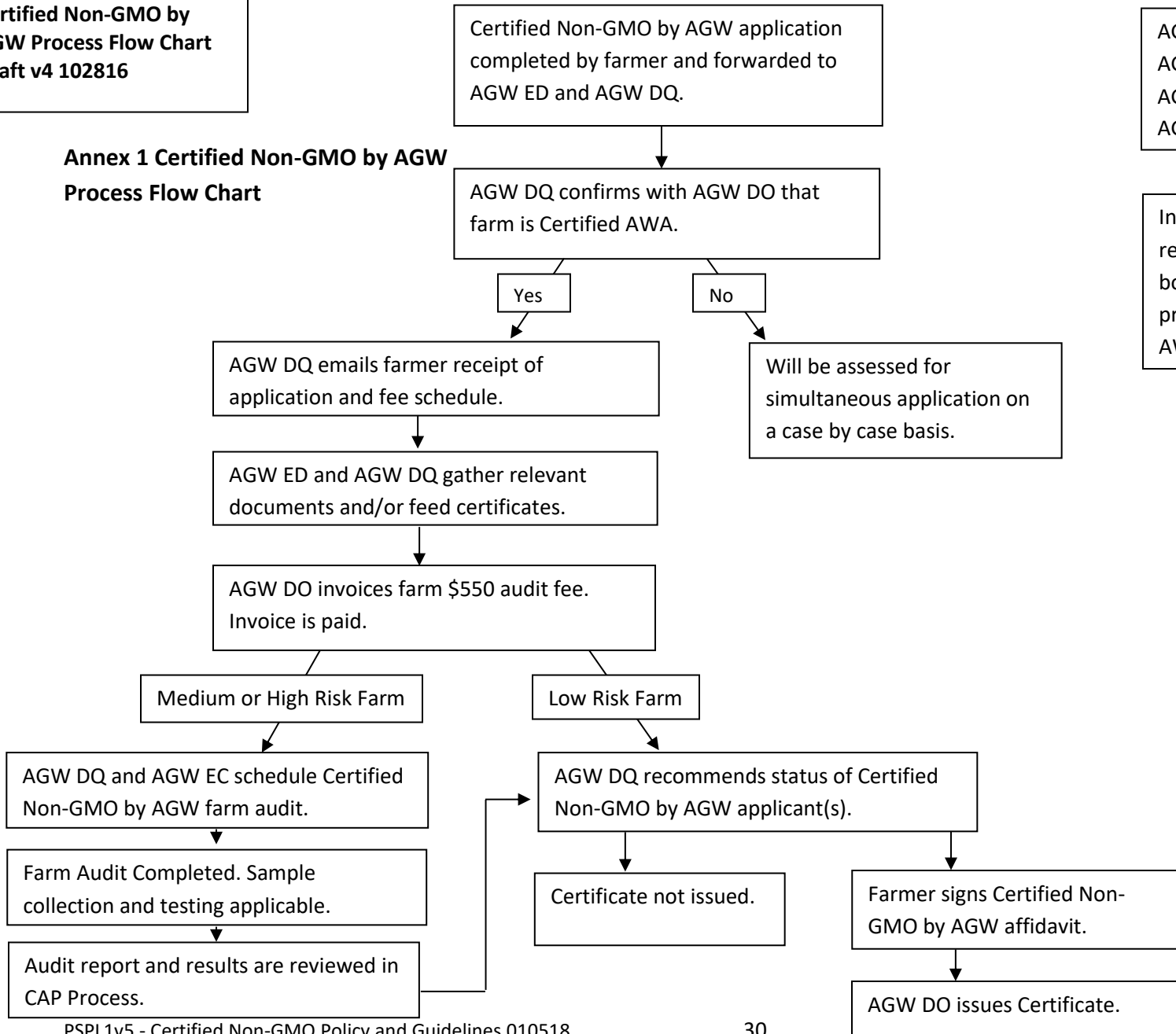
p6.4.6 CNGMO will notify the farmer of the use of subcontracted laboratories prior to sample collection and testing.

p6.4.6.1 CNGMO will provide the farmer with an opportunity to object to the selected subcontracted laboratory.

**Annex 1 Certified Non-GMO by AGW  
Process Flow Chart**

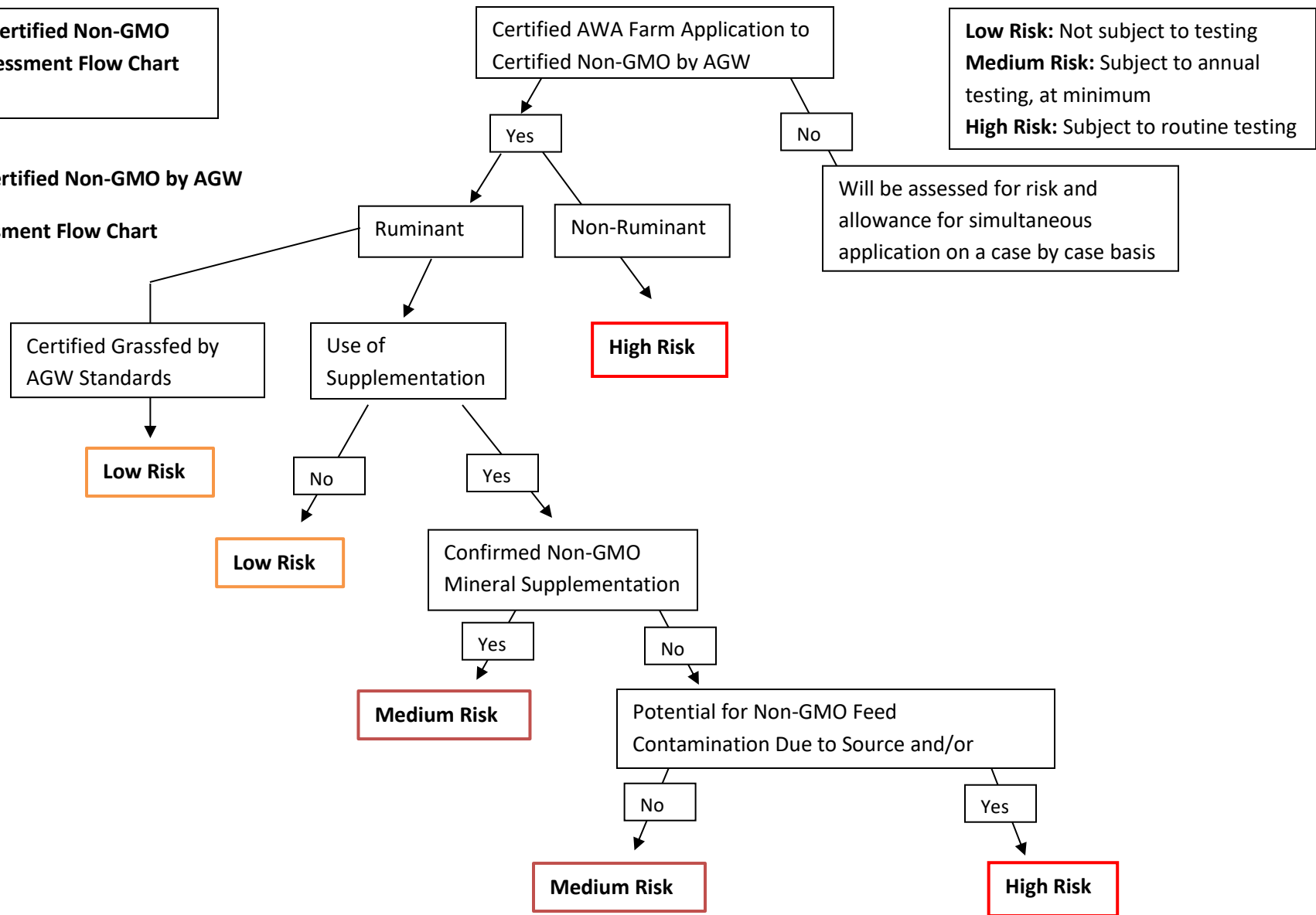
AGW ED – Executive Director  
AGW DO – Director of Operations  
AGW DQ – Director of Quality  
AGW EC—Eligibility Coordinator

In the event a concern arises regarding farm compliance with both the AWA and CNGMO programs, precedence is granted to AWA.



**PCI2v2 Certified Non-GMO  
Risk Assessment Flow Chart  
101316**

**Annex 2 Certified Non-GMO by AGW  
Risk Assessment Flow Chart**



## **Annex 3 Board of Directors and Stakeholders Annex**

Certified Non-GMO by A Greener World Board of Directors

1. Composition
  - a. President (nominated)
  - b. AGW Representative- Director of Quality, A Greener World
  - c. Members
    - i. Members shall include five (5) representatives of significantly interested parties according to CNGMO's certification priority
2. Terms

Directors will be appointed for a three-year term.



## **Annex 4 Use of the CNGMO Seal**

**Principle: The CNGMO seal and label is used to promote our farmers' products; but at all times its integrity must be maintained**

### **1. Use of the label on single ingredient products**

If animals have been raised on CNGMO farms and slaughtered at AWA recommended plants their meat and hides can carry the CNGMO label

If dairy animals are raised on CNGMO farms their milk can carry the CNGMO label

Fiber from animals on CNGMO farms can carry the CNGMO label

Fruits and vegetables tested and verified to be Non-GMO, and produced on CNGMO farms can carry the CNGMO label

Seed tested and verified to be Non-GMO, and produced on CNGMO farms can carry the CNGMO label

Feed tested and verified to be Non-GMO, and produced in CNGMO mills can carry the CNGMO label

### **2. Use of the label on multi-ingredient items**

**In order for the CNGMO label to be used on multi-ingredient items all ingredients in the product must come from CNGMO approved sources.**

Agreed exceptions will be reviewed at least annually and/or when further information on their availability is made evident.

### **3. Use of the statement "Non-GE" or "Non-GMO"**

If a product is not eligible to carry the AWA label, it may still be eligible to use the statement "Certified Non-GMO by AGW [ingredient]"

In order to use the "Non-GMO" or "Non-GE" statement the following requirements must be met:

1. Products approved under the CNGMO module can be labeled as Non-GMO\* or Non-GE\*
  - a. Somewhere on the packaging the following statement must be clearly legible: "Certified by AGW"\*
2. Animal based ingredients must meet the AWA label usage requirements. (See AWA Policy Document Annex 25).
3. The end product must be comprised of 100% CNGMO approved ingredients
4. No ingredient in the final product appears on the prohibited list (see section 4 below)

#### **4. Prohibitions**

CNGMO reserves the right to withhold approval to use the CNGMO seal or label or the phrase “Non-GMO Certified by AGW” or “Non-GE Certified by AGW” if other ingredients, a processing method or the final end product does not meet the principles of the CNGMO program.

The current list of prohibited products and processes is as follows. This list will be reviewed and updated regularly:

- GMO ingredients
- All ingredients stated in the AWA label usage requirements. (See AWA Policy Document Annex 25)
- High and medium risk ingredients that have not been tested in an ISO/IEC 17025 accredited laboratory

The phrases “no GMOs”, “no GEs,” contains “zero GMOs,” and contains “Zero GEs” must not be used.

#### **5. Use of the CNGMO seal or label and marketing material in association with a product that only uses the “made with” statement**

The CNGMO seal or label in the form of posters, banners etc. can be used when a product that only uses the “Non-GMO Certified by AGW” or “Non-GE Certified by AGW” statement is marketed. The use of the CNGMO seal on animal based ingredients must follow the AWA label usage requirements. (See AWA Policy Document Annex 25).

##### **Definitions:**

Animal based ingredient – any product derived from an animal that is or could be approved by the AWA program.

Ingredients – the components of the final retail product as provided to AWA by the farmer/marketer