



SGF INTERNATIONAL E.V.
SURE-GLOBAL-FAIR

IMPLEMENTING PROVISIONS
FOR THE

VOLUNTARY CONTROL
SYSTEM (VCS)

STATUS: 2007

GENERAL

The Implementing Provisions for the Voluntary Control System describe all terms used in the VCS and all rules for the participating companies. These are valid for all affiliated bottlers in the RQCS as well as for all associated raw material producers and traders of the International Raw Material Assurance (SGF/IRMA).

The participation in the control system shall assist the producer in the fulfilment of his necessary diligence to market only proper goods.

However, participation and the VCS certificate issued to the participants do not constitute a "carte blanche".

The responsibility to take due care always remains with the participant. His legal liability to market and in particular process only proper goods complying with the relevant food law regulations within the EU as well as with the European commercial practice (e.g. EU Fruit Juice Directive, relevant national regulations, CoP/AIJN, etc.) remains unchanged as, in case of complaint, do the legal and statutory rights of the SGF for injunction.

1. DEFINITION OF TERMS

The terms used in this documentation are to be understood as follows:

1.1 Additives

are all substances which, according to the valid EC Directive and the relevant national statutory regulations, are permitted for the manufacture of the products listed therein.

1.2 Authentic samples

are taken by independent inspectors during current production at defined places of the production line. The raw material and the correct application of the production processes are examined at the same time.

1.3 Authenticity criteria

are defined by B criteria of the current valid AIJN/CoP.

1.4 Checklist for traders and brokers

check list for inspection of traceability aspects and of system rules at trader and broker companies (enclosure).

1.5 Checklist for transportation companies

checklist for inspection of hygiene and quality relevant aspects in the transportation of food (enclosure).

1.6 Code of Conduct (CoC)

basis for creation of awareness for sustainability and for the implementation of social, economic and ecological standards in SGF/IRMA member companies (enclosure).

1.7 Code of Labelling (CoL)

comprehensive Codex for labelling issues for the uniform and clear declaration of semi finished goods (enclosure).

1.8 Code of Practice (CoP)

is the guideline of the "European Fruit Juice Association" (AIJN) regarding the expectations the fruit juice industries in the countries of the European Community

have to comply with for the goods produced by this industry and marketed within its area. Even with values within standard B, this does not automatically indicate an authentic product. An objective interpretation of the complete analysis spectrum by an experienced expert is necessary. Even if all numerical values are within the CoP range, this does not automatically mean the marketability of the product. The application of suitable research methods is presupposed.

The CoP replaces the national values which formerly have been an aid in the evaluation of authenticity of fruit juices and products made thereof, like AFNOR or RSK values.

1.9 Consumer goods

are all products defined in the SGF statutes, namely fruit juices, fruit nectars and other products made from fruits and vegetables which are processed and treated and filled into consumer packages.

1.10 Hygiene checklist

checklist (enclosure) for review of hygiene relevant aspects in the production of semi-finished goods based on

- EC Directive 93/43 on Hygiene
- AIJN Guide of Good Hygiene Practice

1.11 Identity test

is the determination of analytical conformity of two products. This involves tests of:

- Identity of the semi-finished good with a retained sample
- Identity of a consumer good with a semi-finished good used for production

1.12 Manufacturers of consumer goods

are companies which process raw materials, semi-finished goods, and additives from own and/or external production to make consumer goods.

1.13 Manufacturers of semi-finished goods

- are companies which process and treat raw materials from their own production and/or purchased goods to make and sell semi-finished goods made from these raw materials for further processing.
- are also companies which process and treat semi-finished goods and additives from own and/or external production (in particular blending) and sell these to companies for further processing and/or to traders in semi-finished goods.

1.14 Marketing designations

are all designations contained in the valid EC Fruit Juice Directive and in the relevant national statutory regulations.

1.15 Permissible and suitable manufacturing processes

The juice used as an ingredient in any of the consumer goods must be manufactured using the technologies according to the valid EC Directive.

1.16 Quality tests

are sensory and analytical analyses, i.e. examinations of all information, reference numbers and relevant ratios derived thereof required for a reliable evaluation of proper product quality.

The examination criteria as laid down in the CoP system (reference numbers and analysis methods) shall assist in the evaluations. Experienced experts shall supplement them as appropriate by latest findings on suitable additional reference

numbers and advanced analysis methods as well as by a qualified evaluation.

1.17 Raw materials

are fruits and vegetables in the sense of the valid EC Fruit Juice Directive and the relevant national statutory regulations.

1.18 Retained samples

are representative samples from all batches which went into distribution and/or were purchased.

1.19 Semi-finished goods

are all intermediate products from which fruit juices, fruit nectars and fruit juice beverages as well as products of a similar nature may be produced in accordance with the valid EC Directive and the relevant national statutory regulations.

1.20 System goods

are authentic goods manufactured by a VCS participant in accordance with the regulations of the control system or for which a quality test has been presented. Furthermore, these goods shall be produced following generally acknowledged hygiene guidelines.

1.21 Traders and brokers in semi-finished goods

are companies which sell and/or trade in semi-finished goods (fruit juices, fruit juice concentrates, etc.) from external production sources.

1.22 Traceability

Traceability is understood as the providing of product relevant information, retained samples, and data in order to make it possible to trace back defined product portions through all production and sales stations. Reference is made to the AIJN Guideline on Traceability.

2. RULES

for the Participation in the Voluntary Control System (VCS)

With their application to the Voluntary Control System, the VCS participants commit themselves to comply with the following rules in addition to their necessary diligence:

2.1 Quality assurance measures for manufacturers of semi-finished and consumer goods

All VCS production companies will contribute to a safe and proper product quality and fair competition by:

- **Documentation**

Keeping and maintaining complete records and documentation on

- raw materials and semi-finished goods produced, purchased or processed (fruits, juices, purees, concentrates, aroma, etc.)
- all ingredients and treatment agents used for processing
- type of production or processing

The records and documentation have to be kept for the following minimum periods:

- manufacturers of consumer goods: at least till expiration of the "best before" date.
- manufacturers of semi-finished goods: at least 3 years

Documentation of Pesticides and Growth Regulators

- Companies processing fruit, fruit mash and vegetables require information from their pre-suppliers with regard to the plant, fruit and vegetable treatment agents (pre- and post-harvesting

treatments) used in fruit and vegetable cultivation and/or storage. This information must be documented. The documentation duty particularly applies to pesticides, including herbicides and growth regulators.

- **Retained sample storage**

Keeping of retained samples of semi-finished and consumer goods from own or external production that will be further processed (blended) or otherwise produced in the company:

Manufacturers of semi-finished and consumer goods shall take samples from a defined production unit, e.g. batch, tank, or other lot size that may not exceed a one-day's production quantity.

Manufacturers of semi-finished and consumer goods have to make sure that in case of deliveries from non-VCS suppliers retained samples are being taken. Even for goods from VCS suppliers, in general retained samples shall be provided.

In case of deliveries in drums or small batches, it must be ensured that the respective retained samples per batch are being taken.

The following minimum quantities shall be provided for retained samples:

juice/puree	2 to 3 x 250 g or ml
concentrate	2 x 200 g or ml
aroma	2 x 30 g or ml

The retained samples are to be kept under suitable conditions, if necessary pasteurized, in cool storage or deep-frozen.

The retained samples must be kept for the shelf life of the finished products, raw material samples must be kept at least 12 months.

- **Assurance analysis for purchased goods**

On principle, observe the necessary diligence for all additional purchases.

Furthermore, when purchasing non-system goods, suitable quality tests have to be conducted for determination of authenticity:

- a minimum of one analysis for each contract according to the CoP guidelines, if required qualified additional analyses
- additional assurance analyses according to the SGF minimum scope, if required qualified additional analyses
- guide values for analysis frequency:
 - up to: 100 t delivery: 1
 - up to: 500 t delivery: 2
 - above 500 t delivery: 1 each after about 25%, 50% and 75 % of the total quantity

- **VCS contact**

Appointing of a VCS contact and two substitutes

2.1.1 Additional rules for manufacturers of semi-finished goods

In addition to the a.m. obligations, the following rules apply for this group of VCS participants:

- **Providing packing lists**

In case of drummed goods, providing a detailed packing list is mandatory. In case of small batches (small kegs and cans) at least the batch number has to be stated.

- **Following the Code of Labelling**

In case of drummed goods, following the rules of the Code of labelling.

- **Hygiene audits**

Compliance with the requirements according to the hygiene checklist.

2.1.2 Additional rules for manufacturers of semi-finished goods in remote countries and areas not yet routinely controlled by plant inspections

In addition to the a.m. obligations, the following rules apply for this group of VCS participants:

- **Quarterly information**

on all product deliveries into the VCS/IRMA control area with statements about recipient and date of delivery for additional sampling and routine controls.

2.1.3 Product range

The SGF shall be informed about the product range.

2.2 Quality assurance measures of traders/brokers

Traders/brokers in the VCS contribute to safeguarding the VCS and the semi-finished goods traded within this system in particular by:

- **Trading exclusively goods of known origin**

Following a code of honour, VCS traders/brokers shall trade only goods of known origin (name, address of manufacturer).

- **Identification of VCS system goods**

- VCS system goods are identified in all offers and delivery documents as such
- or in case of goods from a non-VCS participant with presentation of quality test results as well as proof of availability of all components.

- **Identification of manufacturer**

Informing the customer about the name of the manufacturer of the semi-finished good (fruit processor) or in case of claiming "source protection" informing the SGF.

- **Documentation guarantee**

Guarantee that when trading semi-finished goods from non-VCS participants, in particular blended products, the following are available:

- a complete and correct documentation of formulation and all components
- retained samples of all components
- a quality analysis

Guide values for analysis frequency:

- up to 100 t trade batch: 1
- up to 500 t trade batch: 2

above 500 t trade batch: 1 each after about 25%, 50% and 75 % of the total quantity.

2.3 Quality assurance measures of the transport companies

Transport companies in the VCS contribute to the safety and impeccable quality of the goods they transport by means of:

- **Documentation**

Keeping complete records about

- completed cleaning work
- completed transports

- **Cleaning transport containers**

All transport containers must always be cleaned to completely rule out the risk of microbial contamination and contamination with the previous product.

2.4 Verification measures of the VCS

Within the scope of plant inspections, the SGF will verify the compliance with the above listed quality assurance measures, the complete traceability of all components as well as all aspects relevant to food safety.

2.4.1 Authenticity controls

The VCS producers allow the representatives of the SGF unannounced access to all facilities of the production plant during operating hours.

The SGF inspectors are entitled:

- to take any sample
- from running production

- from storage
- from the retained sample storage

including semi-finished good(s) and additives used in all VCS companies producing semi-finished and/or consumer goods.

- to inspect and to note in the inspection report the records and documents on suppliers or customers, origin and/or producer of purchased or delivered semi-finished goods as well as quality test results, all kept as proof of the control chain.

This includes among others proof of identity as well as the information required for recognition as VCS system goods naming the VCS producer of the semi-finished good used and/or presentation of an analysis report.

2.4.2 Hygiene controls at VCS manufacturers of semi-finished goods

The SGF inspectors are entitled to conduct frequent additional hygiene audits in the companies producing semi-finished goods. The respective requirements are reviewed based on the SGF/IRMA checklist.

The implementation of possibly required corrective measures will be checked during the following regular plant inspections.

2.4.3 Control of non-system goods

If a VCS producer processes semi-finished goods that are non-system goods, the SGF is entitled to have these goods examined within the

required scope on cost of the respective VCS participant.

2.4.4 Hygiene controls of VCS transport companies

The SGF inspectors are entitled to carry out regular audits to check the requirements based on the SGF/IRMA checklist for transport companies. The implementation of any necessary corrective action from the audit will be checked during the subsequent controls.

2.4.5 Traceability controls of traders/brokers

The SGF inspectors are entitled to carry out regular audits to check the requirements based on the SGF/IRMA checklist for traders and brokers.

The implementation of any necessary corrective action from the audit will be checked during the subsequent controls.

2.4.6 Code of Conduct audits with SGF/IRMA participating companies

During the regular audits, the SGF inspectors check the social, economic and ecological sustainability standards in IRMA member companies, as stipulated in the SGF/IRMA Code of Conduct.

The implementation of any necessary corrective action from the audit will be checked during the subsequent controls.

2.5 Additional Measures in Case of Complaints

In case of a non-compliance with the food law or in case of infringement against the rules and regulations of the control system, the SGF is entitled:

- to determine additional obligations and measures against the companies concerned to avoid the risk of repetition
- for concerns regarding the food law to ask for all necessary information (including quantities used and conditions) in particular needed for an argument with concerned suppliers.
- to ask the concerned companies for reimbursement of all costs arising from determination of food law problems, and/or verification of false statements on origin, quality, storage, transport, supplier, etc. and/or respective post controls.

2.6 VCS Certificate of Participation

Upon proof of

- examination of product samples taken during plant inspections with no complaints
- proper hygiene conditions in production according to hygiene

audit at manufacturers of semi-finished goods

- implemented corrective measures in case of complaints
- compliance with the system rules
- payment of SGF membership dues
- fulfilled transport conditions according to the check list for transport companies
- fulfilled traceability conditions according to the check list for traders and brokers
- fulfilment of the sustainability standards by manufacturers of semi-finished goods according to the Code of Conduct

the participating VCS company will receive a formal recognition as certified participant in form of a certificate. This certificate will be renewed annually if the prerequisites have been fulfilled.

Enclosures:

- SGF/IRMA hygiene check list
- SGF/IRMA check list for transport companies
- SGF/IRMA check list for traders and brokers
- SGF/IRMA Code of Conduct
- SGF/IRMA Code of Labelling.