

Rules of the Voluntary Control System



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2 General principles

2.1 General

The **Voluntary Control System (VCS)** encompasses the entire supply chain, from receipt of the fruit or vegetables in the processing plant through to sales to the consumer.

Participation in the control system should give the company **additional assistance in fulfilling its legal obligation** to place only proper goods on the market.

While the **certification status “certified” is by no means a "carte blanche"**, a company will often be expected to present it as **evidence of its good quality standards**.

This does not affect a company's legal obligation to sell and in particular process only proper goods complying with the relevant food law regulations as well as with commercial practice (e.g. AIJN Code of Practice and Code of Business Conduct) and/or any other applicable statutory regulations and industry standards.

2.2 Corrective actions

SGF has **legal and statutory rights for injunction** in case of complaint.

2.3 Confidentiality

SGF undertakes to treat company-related data and findings with due **confidentiality**.

The members of the Executive Committee do not receive any company-related information until internal actions are no longer effective/adequate.

They will maintain **silence about information and facts relating to companies involved in complaints and corrective actions**. For this reason, the members of the Executive Committee sign a non-disclosure agreement. All employees in the Secretariat sign a corresponding non-disclosure agreement together with their contract of employment.

3 Successful participation in the Voluntary Control System



The participating companies undertake to **comply with the following rules.**



They undertake to inform the Secretariat immediately if their own analyses make them aware of adulterated, illegal or unsafe food products **among their purchased goods.**



They sign the **Declaration on Sustainable Business Management pursuant to the AIJN Code of Business Conduct** (Annex 8). Tank cleaning stations and transport companies are exempt from this.



They grant SGF staff or independent auditors commissioned by SGF **access at any time to all production units (including closed production units).**



They name a **contact person** for SGF and a deputy to cover for any periods of absence.



3.1 Manufacturers of consumer and/or semi-finished goods (IQCS/Bottler, IRMA/Processing, IRMA/ Blending, IRMA/Pre-Processing)

contribute to safeguarding perfect product quality and fair competition **by**:

3.1.1 Authenticity and food safety

➔ **Placing only** authentic, safe food on the market.

3.1.2 Documentation

➔ **Keeping and retaining** full records for complete traceability, referring in particular to:

- fruit, vegetables, and semi-finished goods that they have produced, purchased and processed
- suppliers
- all ingredients and treatment agents used for processing
- working and processing
- country of origin of purchased goods
- transport
- storage
- packaging

The records and documentation must be kept for the following **minimum periods**:

- Manufacturers of consumer goods: at least until expiry of the best-before date, at least 36 months

3.1.3 Retained sample storage

➔ Keeping of retained samples of semi-finished and consumer goods from own and/or external production that will be further processed (even if this only entails blending and/or repackaging) or produced in the company:

The samples are taken **from a defined production unit**, e.g. batch, tank or other lot size, **that may not exceed a one-day's production quantity**.

It is also necessary to ensure that retained samples are taken from incoming and outgoing deliveries of semi-finished goods. The same also applies to partial incoming deliveries.

At least the following quantities are to be kept available for SGF and stored under suitable conditions, if necessary pasteurized, in cool storage or deep-frozen so that the samples are representative for the goods:

- | | |
|---------------|----------------------|
| ▪ juice/puree | 2 to 3 x 250 g or ml |
| ▪ concentrate | 2 x 200 g or ml |
| ▪ flavouring | 2 x 30 g or ml |



3.1.4 Storage periods for retained samples

- ➔ **Storage** of retained samples for consumer goods **until the corresponding best-before date plus one month**
- ➔ **Storage** of retained samples taken from semi-finished goods for outgoing deliveries for at least **12 months** after the delivery date

Furthermore, retained samples referring to the purchase of semi-finished products must be kept until **expiry of the best-before date** for the resulting products.

3.1.5 Purchasing system goods

- ➔ **Procurement of system goods** when purchasing already processed fruit and vegetables.

Non-system goods can also be purchased under exceptional circumstances; in this case, conformity analyses must be carried out on the purchased good:

- pursuant to the Conformity Matrix (Annex 1)
- analyses of fruit or vegetable products that are not listed in the SGF Conformity Matrix, as far as this is necessary for the respective product group according to expert evaluation or due to current observations

Minimum requirement for **analysis frequency** in the case of **non-system goods**:

- 1 analysis test from a delivery with a total product quantity of up to 500 t per calendar year for products from the same producer with the same material specification.
- for quantities exceeding 500 t: one additional analysis test per partial quantities up to 500 t from the deliveries.

Best practice:

- additional analyses may be requested by SGF for products with a high risk of adulteration according to the Food Fraud Vulnerability Assessment (FFVA) available in the SGF member portal JuiceBase

It must also be ensured that the purchased non-system goods were produced under conditions complying with the statutory hygiene requirements, e.g., by own audits or third-party audits, complying at least with the ACS standard.

3.1.6 Solely for manufacturers of semi-finished goods (IRMA/Processing, IRMA/Blending)

3.1.6.1 *Requirements as per ACS*

- ➔ **Production conditions** checked using the Audit Checklist Standard (ACS) (Annex 2), with necessary corrective actions implemented within a period to be stipulated by SGF.

3.1.6.2 *Product labelling*

- ➔ **Labelling** of goods with clear, correct details or with corresponding details on unequivocally attributable accompanying papers

Details must include at least the supplier or manufacturer and the respective product name, as well as allowing traceability of the lot.

The additional information stated in the SGF/IRMA Guideline for Packaging Labelling (IRMA/GPL) (Annex 3) can be used for guidance.

3.2 Traders and brokers (IRMA/Broker)

contribute to safeguarding perfect product quality and fair competition **by**:

3.2.1 Requirements according to the IRMA/Broker checklist

- ➔ **Trading conditions** checked using the IRMA/Broker checklist (Annex 6), with necessary corrective actions implemented within a period to be stipulated by SGF.

3.2.2 Trading solely with goods of known origin

- ➔ **Placing** only goods of known origin on the market (name and address of the supplier, country of origin of the product).

3.2.3 Identification of system goods

- ➔ **Identification** of system goods in all offers and sales / delivery documents

3.2.4 Purchasing system goods

- ➔ **Procurement of system goods** when purchasing already processed fruit and vegetables.

Non-system goods can also be purchased under exceptional circumstances; in this case, conformity analyses must be carried out on the purchased good:

- pursuant to the Conformity Matrix (Annex 1)
- analyses of fruit products that are not listed in the SGF Conformity Matrix, as far as this is necessary for the respective product group according to expert evaluation or due to current observations

Minimum requirement for analysis frequency in the case of **non-system goods**:

- 1 analysis test from a delivery with a total product quantity of up to 500 t per calendar year for products from the same producer with the same material specification.
- for quantities exceeding 500 t: one additional analysis test per partial quantities up to 500 t from the deliveries.

Best practice:

- additional analyses may be requested by SGF for products with a high risk of adulteration according to the Food Fraud Vulnerability Assessment (FFVA) available in the SGF member portal JuiceBase

It must also be ensured that the purchased non-system goods were produced under conditions complying with the statutory hygiene requirements, e.g., by own audits or third-party audits, complying at least with the ACS standard.

3.2.5 Retained sample guarantee

- ➔ The availability of retained samples for all used product batches and ingredients when trading/brokering, blending, or repackaging semi-finished products not originating from certified system participants.



3.3 Tank cleaning stations (IRMA/Tank Cleaning)

The rules for tank cleaning stations taking part in the VCS are stated in the "Voluntary Control System (VCS) for Tank Cleaning – Food" (Annexes 4, 4a, 4b)

3.4 Transport companies (IRMA/Transport)

contribute to assuring the perfect quality of the goods transported by them **by**:

3.4.1 Requirements according to the transport company checklist

- ➔ **Transport conditions** that can be checked with the transport company checklist (Annex 11)

3.4.2 Documentation

- ➔ **Full records are to be kept** about

- | |
|---|
| <ul style="list-style-type: none"> ▪ completed cleaning work ▪ completed transports |
|---|

The data must be kept for at least **12 months**.

3.4.3 Cleaning transport containers

- ➔ **Ensuring** that all transport containers are cleaned in such way as to rule out any biological, chemical, or physical contamination, as well as contamination with the previous product.

The minimum quality standards for cleaning tank containers, their transport units and their installations for loading and unloading **correspond to the requirements for the basic level in the checklist for tank cleaning stations** (Annex 4).



3.5 Warehouses (IRMA/Warehouse)

contribute to assuring the perfect quality of the goods that they store and/or process **by**:

3.5.1 Requirements as per ACS

- **Storage and processing conditions** that are checked with the ACS.

3.5.2 Documentation

- **Full records are to be kept** about

- completed storage
- completed processing

The data must be kept for at least **36 months**.

4 Conformity verification

SGF verifies **compliance with the rules for participating in the Voluntary Control System**, all relevant aspects of **process and product conformity, traceability, documentation and food safety** by conducting **audits** with **subsequent food chemistry analyses**.



Audits and plant inspections are carried out **announced or unannounced**.



Documents and information requested by SGF for purposes of verification must be made available in adequate form by the participating companies.



In addition to scheduled audits and plant inspections, SGF can also arrange for **further audits or plant inspections** to be carried out in order to fulfil its control mandate if this is required in order to check certain circumstances or to achieve a necessary increase in control density.



SGF is entitled to set **deadlines** for necessary corrective actions. Corresponding implementation is checked after the audit has been carried out, but at the latest during the next regular audit.



SGF chooses and takes process related samples of any kind, which are evaluated by means of chemical-physical analyses (commissioned and evaluated by SGF).



If semi-finished goods are processed or placed on the market that are **not system goods** and for which no corresponding conformity analyses have been carried out to ascertain authenticity and food safety for purchases, SGF is entitled to have these **goods examined within the required scope, at the costs of the respective participant**.












A registered production facility must fulfil the following criteria in order to be awarded "certified" status

- All invoices must be paid within the payment term and (if applicable) the turnover report for calculating the membership fee must be submitted on time.
- Passed annual audit
- Unobjectionable examinations of the product samples tested in the context of the SGF control mandate (where applicable)



The **certification status of a VCS participant** is indicated in the **member portal (<https://juicebase.sgf.org/registeredsite>)** by means of a status icon in the mask Registered Sites:

The following certification statuses can be awarded depending on the site type

-  Certified Bottler
-  Certified Broker
-  Certified Blending
-  Certified Warehouse
-  Certified Tank Cleaning
-  Certified Transport
-  Certified Pre-Processing
-  Suspended
-  In progress

The IRMA/Processing site type can achieve two different "certified" statuses: either

Certified Processing Silver

In order to achieve **Certified Processing Silver** a site must fulfil the requirements as mentioned above:

- All invoices must be paid within the payment term and (if applicable) the turnover report for calculating the membership fee must be submitted on time.
- Passed annual audit
- Unobjectionable examinations of the product samples tested in the context of the SGF control mandate

or

Certified Processing Gold

In order to achieve **Certified Processing Gold** a site must fulfil the requirements as mentioned above:

- All invoices must be paid within the payment term and (if applicable) the turnover report for calculating the membership fee must be submitted on time.
- Passed annual audit
- Unobjectionable examinations of the product samples tested in the context of the SGF control mandate

Additionally

- The site must comply with all requirements of the FRAPP programme, that is:
 - Has the site released data for the current or previous harvest year during the current resp. previous year in the JuiceBase/FRAPP data input (<https://juicebase.sgf.org/frapp?>)
 - Has the site released minimum 10 raw material supplies plus applied substances for all raw materials listed in the product portfolio in the JuiceBase/FRAPP data input (<https://juicebase.sgf.org/frapp?>)



4.1 Inspections with manufacturers of consumer and/or semi-finished goods

4.1.1 Audits and plant inspections

→ The auditors carry out **audits at least once a year** in all semi-finished goods manufacturing plants (IRMA/Processing, IRMA/Blending) on the basis of the SGF Audit Checklist Standard (ACS) (Annex 2).

→ Remote audits are possible in exceptional cases.

An audit is deemed to have been successful when

- all exclusion criteria have been fulfilled
- at least 67% of the points total have been achieved

→ On behalf of SGF, the auditors carry out **plant inspections once a year** in **all consumer goods manufacturing plants** (IQCS/Bottler).

4.1.2 Sampling

The auditors are entitled to take **any samples**

- from ongoing production
- from storage
- from retained sample storage

including

- the used semi-finished goods
- other ingredients not containing any fruit or vegetables
- the processing aids and packaging materials used in the corresponding production procedures

These samples are used by SGF for chemical analysis of product quality.

SGF is also entitled to request samples as described above for purposes of verification.

The **Shipping and packing instructions** must be observed (Annex 5). The costs are to be paid by the company sending the samples.

4.1.3 Traceability controls

The auditors are entitled to **consult and keep records about documents and certificates** referring to

- suppliers or customers
- labelling
- origin and/or producer of purchased or delivered semi-finished goods
- quality test results

This also includes certificates about conformity analyses and inspections of production conditions when purchasing non-system goods.

SGF is also entitled to request documentation as described above for purposes of verification.

4.2 Audits of traders and brokers

4.2.1 Audits and plant inspections

The auditors are entitled to carry out **audits at least once a year** to check the requirements based on the SGF/IRMA checklist for traders and brokers (Annex 6).

An audit is deemed to have been successful when

- all exclusion criteria have been fulfilled

4.2.2 Traders and brokers with blending activities

If traders and brokers have blending activities (goods are further processed or blended on their instructions) in addition to their pure intermediary activities, the rules of section 4.1 apply.

4.2.3 Sampling

The auditors and SGF are entitled to request retained samples of product batch ingredients that have been processed (including repackaging or blending) by third parties on behalf of the SGF member.

4.2.4 Traceability controls

The auditors are entitled to **consult and keep records about documents and certificates** referring to

- suppliers or customers
- labelling
- origin and/or producer of purchased or delivered semi-finished goods
- quality test results

This also includes **certificates about conformity analyses and inspections of production conditions when purchasing non-system goods**.

SGF is also entitled to request documentation as described above for purposes of verification.



4.3 Audits with tank cleaning stations

See Voluntary Control System (VCS) for Tank Cleaning – Food (Annex 4, 4a und 4b).



4.4 Audits with transport companies

4.4.1 Audits and plant inspections

The auditors are entitled to carry out **audits every three years** to check the requirements made of the participating company on the basis of the **SGF/IRMA transport company checklist**.

An audit is deemed to have been successful when

- all exclusion criteria have been fulfilled

4.4.2 Traceability controls

The auditors are entitled to **consult and keep records about documents and certificates** referring to

- suppliers or service providers
- customers
- quality test results



4.5 Audits in warehouses

4.5.1 Audits and plant inspections

- ➔ The auditors carry out **audits at least once a year** in all warehouse companies (IRMA/Warehouse) on the basis of the SGF Audit Checklist Standard (ACS) (Annex 2).

An audit is deemed to have been successful when

- all exclusion criteria have been fulfilled
- at least 67% of the points total have been achieved

4.5.2 Traceability controls

The auditors are entitled to **consult and keep records about documents and certificates** referring to

- customers
- product details
- product traceability
- provided services

SGF is also entitled to request documentation as described above for purposes of verification.

5 Corrective Actions

In case of infringements against the rules of the control system or statutes, SGF is entitled to take the following actions:

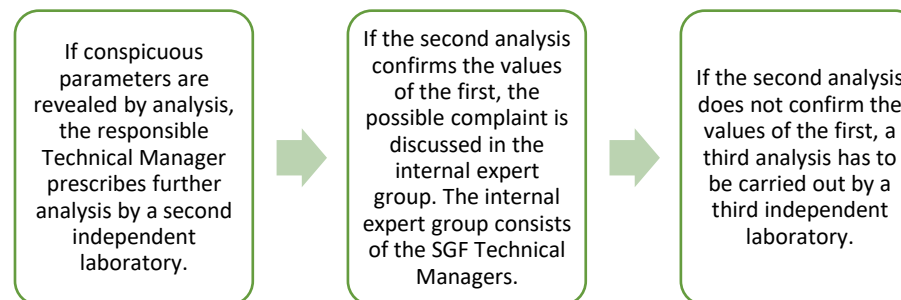
5.1 Internal corrective actions

The Secretariat is responsible for taking decisions about internal actions within the rules of this document and the corrective actions catalogue (Annex 9).

Internal actions are actions **that only target the affected company**. The Secretariat decides on the corresponding internal action according to the catalogue of corrective actions (Annex 9). These mainly consist of the following:

- Certification status “suspended”
- Information letter with corrective action, announcing follow-up inspections
- Request for a declaration of commitment
- Request for a negative covenant
- Penalty requirement for every recurrence
- Block access for users to JuiceBase

The procedure for internal corrective actions based on product quality is as follows:



The following applies in **addition** to **negative covenants**:

If the internal expert group proposes that a product should become the subject of a complaint, the measured parameters have to be **evaluated anonymously by the "Authenticity and Evaluation" working group** before internal action is implemented.

5.2 External corrective actions

If internal corrective actions failed to have the desired effect, a decision has to be taken regarding further actions.

External actions are actions where **third parties are involved**. These mainly consist of the following:

- Legal action before a responsible court
- Information to retailers or other market participants
- Exclusion from SGF membership
- Information to the authorities
- Information to consumer organisations

In the case of an external action the decision about external actions has to be taken by the **Executive Committee** at the suggestion of the Secretariat. To this end, the Secretariat provides the EC with comprehensive information, including data relating to the company.

5.3 Right of objection

The affected company is informed initially by the Secretariat before external action is implemented.

The company has the right to object to external corrective actions to the Executive Committee.

If the Executive Committee rejects the objection, **at the request of the affected company the matter is submitted to the arbitration tribunal of the Waren-Verein Hamburger Börse e. V. (Merchandise Association of the Hamburg Exchange)**.

Decisions taken by the arbitration tribunal are binding for both SGF and the member.

5.4 Health risk

If **values posing a health risk** were analysed and confirmed by a second laboratory, then the above **right of objection is ruled out**.





The Secretariat informs the Executive Committee about the case immediately, including the data relating to the company.

The Executive Committee then decides which steps should be taken next.

The affected company is informed about the decided action which is then implemented.

5.5 Additional impositions

SGF is also entitled:

-  to demand the correct report of turnovers for the purpose of calculating membership fees
-  to demand all necessary information (including disclosure of quantities and conditions of use), particularly **for dealing with affected suppliers** in cases where there are concerns about food safety.
-  to demand the **refund of all costs** incurred in verifying food-safety non-conformities.
-  to demand the **refund of costs** incurred by checking incorrect details about origin, quality, storage, transport, suppliers etc. from the affected companies.

6 Abbreviations and explanations

6.1 Abbreviations

ACS	Audit Checklist Standard
DEF	Database of Evaluated Figures based on Reference Samples from Audited Production
RSaP	Reference Sample from Audited Production
SaP	Sample from Audited Production
SGF	SGF International e.V. – Safe – Global - Fair
SGF/IQCS	International Quality Control System - Part of the VCS for manufacturers of consumer goods making products supplied to the final consumer
SGF/IRMA	International Raw Material Assurance - Part of the VCS for participating companies that are not manufacturers of consumer goods
VCS	Voluntary Control System

6.2 Explanations

AIJN Code of Business Conduct	The AIJN Code of Business Conduct is based on the former SGF/IRMA Code of Conduct and acts as the basis for creating an awareness for sustainability and for implementing social, economic and ecological standards in the fruit juice industry (Annex 7).
AIJN Code of Practice (CoP)	<p>The AIJN Code of Practice (CoP) is the guideline of the European Fruit Juice Association (AIJN) for the fruit juice industry in the countries of the European Community with regard to the expectations made of the products produced by this industry and/or sold within the corresponding area.</p> <p>The CoP contains various criteria relevant for the evaluation of authenticity. A valid conclusion regarding the authenticity of a sample can only be reached by expert interpretation of the whole analytical picture. If some parameters do not fall within the range of indicated guide values, this does not automatically mean that the sample is adulterated. Furthermore, adulterated samples can also have some parameters within the guide values.</p> <p>It is presumed that suitable analysis methods are used.</p>
Samples from Audited Production (SaP)	Samples from Audited Production are samples that are taken by independent auditors during on-going production at defined points in the production line. At the same time, the raw materials and correct application of production processes are inspected, and corresponding records kept.
Reference Sample from Audited Production (RSaP)	
Database of Evaluated Figures based on Reference Samples from Audited Production (DEF)	
Authenticity	Authenticity is the unadulterated quality and genuineness of a product.
SGF/IRMA Guideline for Packaging Labelling (IRMA/GPL)	The SGF/IRMA Guideline for Packaging Labelling (IRMA/GPL) is a comprehensive code for uniform, unequivocal labelling of semi-finished products. (Annex 3)
Consumer goods	Consumer goods are the products defined in the SGF statutes, namely fruit juices, fruit nectars and other products made from fruit and/or vegetables which are processed and treated, bottled and intended for the final consumer.

Manufacturers of consumer goods	Manufacturers of consumer goods are companies according to the SGF statutes which process fruit and/or vegetables and/or semi-finished goods and possibly additives from their own and/or external production to make consumer goods.
FRAPP (Fruit Risk Assessment Programme for Plant Protection Products)	<p>FRAPP is a programme for documenting pesticides used in the cultivation, processing or storage of the processed fruit and vegetables (Annexes 10, 10a).</p> <p>Pesticides are products for the protection of plants or plant parts together with herbicides and growth regulators as defined in the EU Regulation 1107/2009/EEC Article 2, paragraph 1.</p>
Semi-finished goods	Semi-finished goods are all intermediate products based on fruit and/or vegetables according to the SGF statutes (fruit juices, concentrated fruit juice, etc.), from which consumer goods may be made according to the EU Fruit Juice Directive as amended and/or other relevant regulations.
Manufacturers of semi-finished goods	<p>Manufacturers of semi-finished goods are companies which, according to the SGF statutes, process and treat fruit and/or vegetables from their own production and/or purchased goods to make and sell semi-finished goods</p> <p>and/or</p> <p>companies which process and treat semi-finished goods from their own and/or external production (in particular blending) and sell these to companies for further processing and/or to traders of semi-finished goods.</p>
Traders and brokers	Traders and brokers are companies which sell and/or trade with semi-finished goods (fruit juices, fruit juice concentrates, etc.) from external production sources.
Conformity analyses	<p>Conformity analyses are organoleptic and analytic tests whose results are used to test for impeccable and legal product quality, particularly in terms of authenticity, food safety and aspects resulting from the designation.</p> <p>The conformity criteria stipulated in the CoP Reference Guidelines (e.g. KPIs, relevant ratios and test methods) provide help in defining the testing scope. Where applicable, qualified additions can be made, for example to use the very latest findings about suitable additional KPIs and further test methods.</p>

	<p>The results of so-called fingerprinting methods, such as SGF Profiling® (1H NMR Screening) can be used in addition or as an alternative for some KPIs in order to reach an assessment of conformity. Annex 1 provides corresponding information for the products of some fruit types.</p> <p>Furthermore, an appropriate appraisal by experienced experts is also required when conformity analyses are being assessed.</p>
Conformity criteria	Conformity criteria are criteria for checking conformity with applicable regulations and industrial agreements (e.g. AIJN Code of Practice) as amended.
Warehouses	Warehouses are companies that store goods for third parties and, where applicable, blend and/or bottle the goods as an additional service.
Retained samples	Retained samples are representative samples of produced and/or sold and/or purchased products.
Traceability	Traceability refers to the provision of product-relevant information, retained samples and data for tracing defined product units through all production and distribution steps. Reference is made to the AIJN Traceability Guideline.
System goods	System goods are goods placed on the market by SGF certified participants in the VCS in accordance with the rules of the Control System. To maintain the system good status, the products need to be forwarded by SGF certified participants in an uninterrupted supply chain. Non-certified sites may only further deliver system goods if the Tamper Proof packaging is not opened, and the products are handled according to specification requirements.
Non-system goods	Non-system goods are goods placed on the market or processed (also repackaging and blending) by companies other than certified participants in the VCS.
Product designations	Designations are all designations contained in the currently valid EC Fruit Juice Directive and in the relevant statutory regulations.
Permissible production methods and processing aids	Consumer and semi-finished goods must be produced using the methods stipulated in the currently valid EU Fruit Juice Directive and/or in other applicable regulations. In some cases these methods also include the use of certain processing aids.
Ingredient	Ingredients are all substances contained in consumer goods. This includes used additives in accordance with the applicable regulations.

7 List of Annexes (Links to be adapted)

- Annex 1: [Scope of analysis as per SGF Conformity Matrix](#)
- Annex 2: [Audit Checklist Standard \(ACS\)](#)
- Annex 3: [SGF/IRMA Guideline for Packaging Labelling \(IRMA/GPL\)](#)
- Annex 4: [Checklist for tank cleaning stations](#)
- Annex 4a: [Notes on the checklist for tank cleaning stations](#)
- Annex 4b: [The Voluntary Control System for tank cleaning stations](#)
- Annex 5: [\(NEW: Shipping and packing instructions\)](#)
- Annex 6: [Checklist for traders and brokers](#)
- Annex 7: [AIJN Code of Business Conduct](#)
- Annex 8: [Declaration on Sustainable Business Management pursuant to the AIJN Code of Business Conduct](#)
- Annex 9: [Corrective actions catalogue](#)
- Annex 10: [Checklist for transport companies](#)