KAT – Verein für kontrollierte alternative Tierhaltungsformen e.V.

KAT Guide for Mixed Feed Manufacturers

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Table of contents

Preamble

1 KAT

The Verein für kontrollierte alternative Tierhaltungsformen e.V. (Association for Controlled Alternative Animal Husbandry, KAT) is the most important inspection body in Germany and neighbouring EU countries for the scrutiny of eggs from alternative forms of hen keeping (free-range, barn and organic egg production). Virtually all eggs offered for sale on the German market in the food retail trade bear the KAT inspection label. The number of member establishments has grown continually since the association was founded in 1995.

The chief objectives of KAT are:

1. to lay down and implement uniform requirements in all EU countries for the barn, free-range and organic keeping of laying hens with special regard for animal welfare issues,
2. to ensure the complete traceability and assurance of origin of eggs from alternative forms of production in order to eliminate misuse through wrongly labelled goods,
3. to provide transparency for the consumer through the www.was-steht-auf-dem-ei.de [What is on the egg?] website.

2 Internet portals www.was-steht-auf-dem-ei.de and www.kat.ec

In order to create transparency for consumers, KAT offers a special service on the query page at www.was-steht-auf-dem-ei.de: when the stamp code on the egg is entered, the name and place of the establishment are displayed, as well as images of the henhouse and hens. The query page is also available as a smartphone app.

Further information about the KAT system is available on the website www.kat.ec. Every KAT participant can register for the internal area of the website and download relevant documents (circulars, forms, member lists, etc.).

Part I: Introduction

1 Basic principles

1.1 Scope of application

This guide has been developed for feedstuff companies that produce laying hen feed for farms participating in the KAT system and market these under the KAT label. The guide is valid for all feedstuff companies and self-mixers with a total annual quantity of finished feed of more than 5000t.The Guide serves as a tool for the systematic implementation of KAT requirements for the assurance of origin and traceability of the process stages involved in the production and marketing of KAT eggs.

Definition of mixed feed manufacturer:

Mixed feed manufacturers are all operators of stationary milling and mixing equipment for commercial use, irrespective of size.

1.2 Legal requirements

German Food and Feed Code, German Feed Law, German Feed Ordinance, Regulation (EC) 183/2005, Regulation (EC) 178/2002, Regulation (EC) 852/2004, Regulation (EC) 853/2004, Regulation (EC) 767/2009, Regulation (EU) 228/17, Regulation (EC) 852/2004, Regulation (EC) 853/2004, Regulation (EC) 767/2009, Regulation (EU) 2279/17, Regulation (EU) 68/2013, Regulation (EU) 1017/17, Regulation(EC) 1829/2003, Regulation (EU) 892/2010, Regulation (EC) 378/2005, Regulation (EC) 882/2004, Regulation (EC) 152/2009, Regulation (EC) 1831/2003, Regulation (EC) 396/2005, Regulation (EU) 225/2012 and Directive (EC) 2002/32 in the current applicable versions.

1.3 Participation in the system

Each establishment shall register independently for its participation in the system. The application to participate in the system must be completed in full and sent to the KAT Office.

Establishments that wish to participate in the KAT system must have their feedstuffs for laying hens certified according to the QS and/or GMP+ standard. Feedstuff standards that are benchmarked and recognised by GMP⁺FSA and/or QS are also accepted. For the production of organic feedstuffs submission of an up-to-date organic certificate is sufficient.

An overview of the establishment containing the following information must be attached to the application for system participation:

- ✓ Establishment parameters:
  Name/address and contact data
- ✓ Certification currently held + up-to-date certificate
- ✓ Other commercial units on the premises

The master data are stored in the KAT database. The system provider KAT must be notified immediately of any changes to the master data.

Form FB-A 14 Application for participation in the KAT system FM

Form FB-FM 1 Description of establishment

After successful examination of the submitted documents, the applicant receives two copies of the KAT Mixed Feed Manufacturer Label Utilisation Contract for signing. As soon as this has been signed and returned to the KAT Office, the system participant will be given a unique internal KAT identification number, the KAT ID, and login data for the KAT database.

2 KAT verification audits

All system participants are obliged to comply with the KAT requirements/criteria and to have these checked and monitored.

In addition to the prerequisites for participation in the system as described under point 1.3 above, KAT, in the capacity of system provider, also carries out verification audits to ensure that the establishments are complying with the KAT requirements as described in this Guide. The establishment is obliged to grant the auditor access to all the information and premises relevant for the audit.

Verification audit checklist for mixed feed manufacturers

2.1 Frequency of verification audits

The verification audits are carried out in the form of matrix controls. This means that the company headquarters and 33% of the affiliated sites are audited annually, so that all sites have been verified within 3 years.

In addition, unannounced special audits or so-called spot audits (short audits) can be carried out in justified cases.

For feed manufacturers that are not part of a group of companies, verification audits are carried out every two years.

2.2 Verification audit procedure

During the audit, all requirements as stipulated in the KAT Guide are inspected. The establishment is obliged to collaborate with the auditor and to support the auditor during the audit.

The on-site audit is broken down into the following stages:

- ✓ Opening meeting
- ✓ Inspection of the existing self-monitoring and quality systems, as well as document inspection
- ✓ Establishment inspection
- ✓ Final meeting with discussion of the deviations identified

Opening meeting

During the opening meeting, the audit procedure is discussed with the person in charge of the establishment. If it is not an initial audit, checks will be made to determine if there have been any structural changes or changes to the production procedures since the last audit that need to be given special consideration during the audit.

Examination of documents

As part of the examination of documents, the establishment's self-monitoring and quality systems, as well as the documents, certificates and records required in the KAT Guide, are examined and inspected retrospectively from the time of the last audit.

Establishment inspection

During the establishment inspection, the auditor looks at all areas of the establishment and related production sequences and inspects them for conformity with the requirements of the KAT Guides.

Final meeting

In the final meeting, the auditor presents all audit results and discusses the deviations identified with the person in charge of the establishment. After discussing the deviations, the relevant corrective measures, including deadlines by which time they must be implemented, are established with the person in charge of the establishment. The auditor documents in writing the deviations and corrective measures discussed and makes this written record available to the establishment.

2.3 Definition of assessment parameters

The following assessment grades are awarded during verification audits:

A, B, C and D

Deviations occur when the inspection criteria of the KAT standard are not met in full.

- ✓ **A:** No shortcomings/full compliance with the requirements of the Guide.

  The inspection criterion was fully complied with, i.e. with no shortcomings.
- ✓ **B:** Minor shortcomings/almost full compliance The inspection criterion was almost met in full, i.e. there are only minor shortcomings.
- ✓ **C:** Only a small proportion of requirements are implemented. The inspection criterion was not met in full, i.e. only a small proportion of the requirements were implemented.
- ✓ **D:** Significant shortcomings/requirements of the inspection criterion not met. The inspection criterion was not met in full, i.e. there are major, unacceptable deviations.

If a C/D assessment or lower is issued, corrective measures must be established with a deadline for implementation.

For each requirement criterion, the following points are awarded, depending on the assessment.

Assessment	Comments	Points
A	Full compliance	20 points
B	Almost full compliance	15 points
C	Only a small proportion of the requirements are being implemented	5 points
D	Requirement not implemented	-20 points

Tab. 1: *Points/assessment of requirements*

2.4 Non-conformities

Non-conformities result in the deduction of a specific percentage from the total number of points (see Tab. 2).

Non-conformities are described in further detail below:

M: Major

A "major" can be awarded for all KAT requirements that are not defined as "K.O." requirements. The auditor can award a "major" if non-observance of a requirement infringes legal regulations and/or poses a risk for food safety. When a major is awarded, 15% is deducted from the total result. Provided that the establishment still achieves at least 75% of the total points, the assessment "passed" is awarded and a KAT conformity certificate issued. If, as the result of awarding a major, the total result is <75%, this automatically leads to the "not passed" assessment and **no KAT conformity certificate** can be issued.

K.O. (Knock Out):

In the KAT guides, certain inspection criteria are identified as K.O. requirements. If an auditor awards a D grade for an inspection criterion that is identified as "K.O.", 50% of the total number of possible points is deducted and this immediately leads to the "not passed" grade. **No KAT conformity certificate** can be issued.

In the case of non-conformities, the following points are deducted, depending on the assessment:

Assessment	Comments	Points
Major	Non-conformity	Deduction of 15% from the total number of possible points
D = K.O.	Non-conformity	Deduction of 50% from the total number of possible points

Tab. 2: *Deduction of points in the event of non-conformities*

2.5 Grading a requirement with "N.A."

If one or more inspection criteria do not apply to the establishment audited, the auditor can grade these with "N.A." (not applicable). All inspection criteria can be graded "N.A.". The auditor must give reasons for every "N.A." grade in the audit report.

2.6 Procedure in the event of an audit not being passed

If a KAT audit gives reason to believe that food safety or the integrity of the KAT system could be at risk, the standard-setting organisation must be notified immediately.

Establishments that have not passed the audit because a K.O. was issued or because they fulfilled less than 75% of the KAT requirements will only receive a current conformity certificate **if** the follow-up audit shows that the agreed corrective measures have been implemented.

If the establishment still meets less than 75% of the KAT requirements during the follow-up audit, its current KAT conformity certificate will be withdrawn in writing and the establishment will also lose its KAT licence. If the establishment in question holds a QS licence for feedstuff, QS GmbH will be informed that the KAT licence has been revoked. As of this revocation, the establishment will no longer be allowed to market its goods with a KAT label.

2.7 The audit report – stages in the creation of an audit report

Audit reports are generated in the KAT database and are structured as follows:

At the end of the audit, the auditor generates the *preliminary* audit report.

In the preliminary audit report, the auditor explains all non-conformities, as well as all deviations identified and, together with the establishment, determines the corrective measures and deadlines for implementation. The preliminary audit report also includes the **provisional** audit outcome. By signing the report, the establishment and the auditor accept/confirm the deviations identified and the agreed corrective measures and deadlines.

The preliminary audit report is made available to the audited establishment in electronic or written form no later than one week after the audit date.

The *final* audit report is automatically generated in the KAT database and reflects the final audit result with detailed information. The final audit report is automatically emailed to the establishment via the KAT database. If the KAT audit is passed, the establishment also automatically receives the up-to-date conformity certificate together with the audit report.

2.8 Conformity certificate

If the KAT audit is passed, the establishment receives a current certificate of conformity from the KAT-office in accordance with FB-FM 2 with a validity period from the date of release of the audit report (date) to the **end of the second next** Calendar year (i.e. release of the audit report on 23.02.2020 corresponds to validity of the certificate of conformity until the end of 2022).

FB-FM 2 KAT model certificate of conformity

Part II: List of requirements

1 General requirements

1.1 Licensing

1.1.1 **[K.O.]** There is an official licence or registration notification.

Feedstuff plants (plants) that produce mixed feed for placing on the market or store, transport or market it, or produce it for the exclusive use in their own establishment, **are subject to mandatory registration in accordance with Article 9(2) of Regulation (EC) No 183/2005.**

In addition to mandatory registration, **the following establishments are subject to mandatory approval** in accordance with Article 10 No. 1 lit. c and Article 10 No. 3 in conjunction with Annex II Section "Facilities and Equipment" No. 10 of Regulation (EC) No 183/2005 and in accordance with Article 8(2) sentence 3 of Regulation (EC) No 767/2009:

1) Establishments that produce mixed feedstuff using the following additives, or premixes containing the following additives, to place on the market or for the exclusive requirements of their own agricultural operations:

   - coccidiostats and histomonostats.

2) Establishments that mix fats in order to place on the market products for use in feedstuffs (fat mixing establishment).

3) Establishments that produce mixed feed for special nutritional uses that contain levels of feedstuff additives (vitamin A, vitamin D, copper or selenium) that are higher than 100 times the fixed maximum content in complete feedstuff.

Leaflet for the licensing and registration of feedstuff plants (mixed feed), status 17.05.2017

1.1.2 **[K.O.]** For feedstuff production, there is an up-to-date GMP⁺FSA (Feed Safety Assurance) and/or QS certificate for the laying hen feed or, for organic feedstuffs, an up-to-date EU organic certificate.

Information:
Certificates of feedstuff standards that are benchmarked and recognised by GMP⁺FSA and/or QS are also accepted.

1.2 Staff training

Staff who perform tasks relevant to feedstuff manufacture are instructed with regard to the content of the Guide. The training is to be repeated twice per year and documented.

1.3 Crisis management

Contingency plans with clearly defined responsibilities are in place in the event of an emergency. These contain all important contact data. The documents ensure that all persons in charge can be reached outside operating hours. If the emergency concerns KAT system goods, the KAT Office must be notified immediately.

KAT Emergency Guide for Member Establishments

2 Raw materials management and raw materials procurement

2.1 Raw materials requirements

2.1.1 **[K.O.]** Only feedstuff materials included in the positive list of the German Standards Commission are used.

2.1.2 Full details of all raw materials and additives used are stored in the KAT database and updated on a regular basis.

2.1.3 **[K.O.]** The coccidiostats used in the feedstuff plant are named and stored in the database.

2.2 Incoming goods inspection

2.2.1 **[K.O.]** Unambiguous, comprehensible procedures for incoming goods inspections are in place.

2.2.2 **[K.O.]** The incoming goods inspection is conducted on the basis of the assessment criteria established. All incoming goods are checked and documented; evaluation data are available.

2.2.3 Sampling as part of the incoming goods inspections is performed in the establishment by trained employees.

2.2.4 The incoming goods inspection includes checking the last three precarriages, as well as the resulting cleaning measures and the condition of the means of transport.

2.2.5 In the case of certified haulage firms (GMP+/QS), the inspection of the last three precarriages takes the form of a random check and, with non-certified haulage firms, a 100% inspection takes place.

3 Self-monitoring system

3.1 Requirements of self-monitoring system

3.1.1 All potential risks are recorded as part of an HACCP system and the control points (CP) and critical control points (CCP) are determined accordingly.

3.1.2 **[K.O.]** CCPs are correctly documented and mastered.

3.1.3 CPs are correctly documented and mastered.

3.2 Production sequence (cross-contamination)

3.2.1 **[K.O.]** The contamination matrix is designed in such a way as to exclude the possibility of contamination of the feedstuff by unwanted substances within the production process. This also prevents certain additives from exceeding veterinary threshold values.

3.2.2 When handling internal and external returns, effective measures are in place to prevent cross-contamination of critical substances.

3.2.3 Cleaning batches are documented as required.

3.2.4 **[K.O.]** The batch sequences are determined on the basis of the contamination matrix and complied with in a verifiable manner.

3.3 Inspection schedule

3.3.1 **[K.O.]** Inspections have been performed in accordance with the “Sample schedule for mixed feedstuff manufacturers”. If there is QS certification of the laying hen feed, the QS monitoring of the mixed feedstuff is recognised.

3.3.2 The analysis results are evaluated on the basis of the threshold and guide values.

3.3.3 The necessary measures are implemented and documented.

3.3.4 Before use in laying hen feed, high-risk fats, oils or products derived from them must be tested and proven to be harmless in accordance with the requirements defined in Regulation (EU) No 225/2012. When using analysis certificates from the upstream supplier, measures are in place to

ensure that the batch delivered has been proven to correspond to the batch identified on the analysis certificate of the upstream supplier. Traceability and assurance of origin

3.3.5 The feedstuff plant has a traceability system that ensures and documents the identification of batches of raw materials and their link to end products in both directions (from the delivered product to the raw materials, and vice-versa).

3.3.6 All data relevant to traceability must be available within a deadline of max. 4 hours. This is documented comprehensively on the basis of annual tests.

3.3.7 A random check of the traceability system during the audit does not reveal any deviations.

3.3.8 Supply relationships (recipient-laying farm) and corresponding quantity reports are documented in the KAT database.

4 Traceability and assurance of origin

4.1 The feedstuff plant has a traceability system that ensures and documents the identification of raw materials batches and their relation to end product batches in both directions (from the delivered product to the raw materials, and vice-versa).

4.2 All data relevant for traceability must be available within a deadline of max. 4 hours. This is documented comprehensively on the basis of annual tests.

4.3 A random check of the traceability system during the audit does not reveal any deviations.

4.4 Supply relationships (recipient – laying farm) and corresponding quantity reports are documented in the KAT database.

4.5 All delivery notes of KAT feed show the KAT-ID of the production site.

5 Establishment inspection

5.1 Establishment premises

5.1.1 Areas in which feedstuff is treated, processed and stored are designed and set up in such a way as to ensure the safety of the feedstuff.

5.1.2 The establishment premises are clean and well-maintained.

5.1.3 The acceptance points for raw materials are designed to prevent, as far as possible, any negative impact on the products (e.g. bird droppings, effects of the weather, etc.).

5.1.4 When not in use, all acceptance points for raw materials are covered or closed.

5.1.5 Procedures are in place to prevent any mix-up of the relevant acceptance points when raw materials are delivered.

5.1.6 The cargo spaces of the transport vehicles are hygienic.

5.2 Stores

5.2.1 If there are any flatstores at the location, they are designed so as to effectively prevent the mix-up and contamination of the raw materials stored inside and the penetration of birds. The gates of the storage areas are always kept closed when not in use.

5.2.2 The silo cells for raw materials, intermediate and finished products are clean and hygienic.

5.2.3 All floors, facilities and areas of the feedstuff plant are clean and tidy.

5.2.4 Leaks in pipes and other systems carrying the product are repaired as quickly as possible and any product residues removed.

5.3 Production area

5.3.1 Structural preventive measures are taken to prevent, as far as possible, birds and rodents from accessing the inside and production areas of the feedstuff plant.

5.3.2 In the small and microcomponent dosage area (automatic or manual), procedures are in place to prevent the mix-up and incorrect dosage of the components used.

5.3.3 It is ensured that, in the small and microcomponent dosage area, no products are used that have exceeded the best before date specified by the manufacturer.

Information:

If the best before date is exceeded, the feedstuff plant performs appropriate analyses to determine whether or not the product can be used. Any ingredient contents that deviate from the manufacturer's information are taken into account during dosing.

6 Advice and support

The increasing requirements for modern livestock keeping demand greater attention from the management and skilled workers responsible for looking after the animals. Coordinated interaction of the respective forms of rearing, daily monitoring of the animals, regular veterinary checks and providing the animals with high-quality feedstuff are all crucial to success.

6.1 Advice and support

6.1.1 If required, and if asked to do so by the laying farms, the KAT-approved feedstuff plants are able to advise laying farms on choosing and using feedstuff that has been individually adapted to the laying hens. The corresponding documentation is in place.

6.1.2 The valid feedstuff declaration and its intended use are specified in the accompanying documents. In addition, every customer has the right to request from the mixed feed manufacturer an open declaration with the respective percentages. The declaration contains all nutritional information and other data relevant to the feed, for example, its period of use. The feedstuff plant ensures that fluctuations in the raw materials selection that can have a severe impact on the structure and nutrient availability of the feed are minimised as much as possible.

6.1.3 The feedstuff plant ensures that the people charged with advising and supporting the laying farms have the necessary qualifications. These people regularly receive further specialist training. The training is documented.

6.1.4 If necessary (e.g. on veterinary grounds), the mixed feed manufacturer is able to modify the composition of the feedstuff in agreement with the laying-hen keeper for an individual laying farm or to offer a special mixture in order to use the feedstuff to help improve animal welfare. If technically possible, the new feedstuff is offered within a maximum of three working days.

7 Share of regional plant-based raw materials in organically produced feedstuff

7.1 Regional share

Measures are in place to guarantee that the share of regional plant-based raw materials used in organically produced feed is at least 20%.

7.2 Calculation of regional share

The points detailed in this chapter are used to calculate and document the regional share in organic feed and have no influence on the evaluation in the audit report.

7.2.1 There is a list of all agricultural buyers, structured by federal state.

7.2.2 A list detailing total production volumes is available for the calendar year under review. A random check of this data confirms the accuracy of the total production figures.

7.2.3 The total production volume calculated under 7.1.2 was broken down to show the delivered quantity per federal state. A random check of this information confirms that the breakdown is accurate.

7.2.4 The average share of plant-based raw materials in all formulations for laying hen feed was determined as a factor for the subsequent calculation.

7.2.5 A breakdown of the total volume of bought-in plant-based raw materials is provided, broken down by federal state. A random check of this information confirms that the breakdown is accurate.

7.2.6 Based on the data gathered, the share of regional plant-based raw materials in feed was calculated, broken down by federal state. The calculation took account of the factor calculated under point 7.2.4 as well as the currently valid definition of the term “region”.

Annex 1

1. Definitions

Region
A region is the federal state in which the establishment using the feed is located, including directly bordering federal states and directly bordering political entities of neighbouring countries.
Bremen (HB) and Lower Saxony (NI) form one entity, Hamburg (HH) and Schleswig-Holstein (SH) form one entity, Saarland (SL) and Rhineland-Palatinate (RP) form one entity, Berlin (B) and Brandenburg (BB) form one entity.
Bordering political entities of neighbouring countries pursuant to NUTS1 (NUTS = Nomenclature des unités territoriales statistiques).

The Netherlands are equated to the region of Lower Saxony.

1.1 Key to symbols

K.O. criteria are indicated with **[K.O.]**.

References to applicable documents

Required documents/documents for submission

Reference to other sections

1.2 Abbreviations

K.O.	Knock-out (criterion)
Mjr	Major
HACCP	Hazard Analysis and Critical Control Points
NA	not applicable
ID	Identification number

2. Applicable documents

Other applicable documents (in the currently valid version) include:

KAT documents:

- ✓ Leaflet for the licensing and registration of feedstuff plants (mixed feed), status 17.05.2017
- ✓ Verification audit checklist for mixed feed manufacturers
- ✓ Form FB-A 14 Application for participation in the KAT system FM
- ✓ Form FB-FM 1 Description of establishment
- ✓ KAT Emergency Guide for Member Establishments

The documents listed above are available to download from the internal area of the website www.kat.ec

Annex 2

Sample schedule for analysing finished feed (mixed feed manufacturers)

Parameters and number of tests for mixed feed establishments

Feedstuff in t/a	<5,000	< 20,000	< 40,000	< 60,000	> 60,000
Parameter	Number of tests				
a) Mixed feed sampling					
Dioxin+DL-PCB+ NDL-PCB	1	3	4	6	8
Salmonella	5	5	6	7	8
Heavy metals (cadmium, lead, arsenic, mercury)	1	2	3	4	5
b) Sampling plant-based raw material					
Pesticides	2	5	6	7	8
c) Additional sampling organic mixed feed					
GMO	2	5	6	7	8
In derogation from the information under letter (a), for organic mixed feed, the following requirements apply with regard to the dioxin+DL-PCB+NDL-PCB test:	Sampling from the combined weekly laboratory test samples One dioxin analysis per 2,000 t KAT feed Min. 3 analyses per year Max. 12 analyses per year				