This guidance document is intended for use by NSF International clients only.

Your NSF representative will provide the templates needed to generate the required documentation for verification such as Compliance Plans, Affidavits, Suppliers Lists, Formula sheets, Product Profiles etc.

For more information, contact nongmo@nsf.org.
A. NSF Document Overview

1. Handlers / Processors

   Non-GMO Project Handler Compliance Plan:
   Any production or handling operation seeking verification to sell, label or otherwise represent goods with any Non-GMO Project Verified claim must fill out a Non-GMO Project Compliance Plan.

   Non-GMO Project Product Formula Sheet:
   For each multi-ingredient product processed at your operation seeking Non-GMO Project Verification please complete one Non-GMO Project Product Formula Sheet.

   Non-GMO Project Single Ingredient Product List:
   For each single ingredient product that is repacked by your operation and seeking Non-GMO Project Verification please complete one Non-GMO Project Single Ingredient Product List.

   Non-GMO Project Input Supplier List:
   Please complete one Non-GMO Project Input Supplier List, listing all suppliers of the inputs/ingredients used in products seeking Non-GMO Project Verification.

   Non-GMO Project Warehouse Affidavit:
   If you have a storage facility that is storing inputs/ingredients to be used in a Non-GMO Project product, please complete a Non-GMO Project Warehouse Affidavit.

   Non-GMO Project Compliance Affidavit:
   Your supplier may fill out a Non-GMO Project Compliance Affidavit to demonstrate Non-GMO Project compliance for either:
   a. Downgraded Inputs: inputs that originated in a region where no GM production has been allowed (subject to Standard Committee’s approval)
      or
   b. Minor and Micro High Risk Inputs that are the product of a system designed to avoid GMOs.
      or
   c. Micro High Risk Inputs that are not exceptions to variance 4.
      *Non-GMO Project Standard 2.6.1.3, Variance 5, Variance 4.*

2. Brand Owners

   Non-GMO Project Brand Owner Compliance Plan:
   Any brand owner seeking verification to sell, label or otherwise represent goods with any Non-GMO Project Verified claim must fill out a Non-GMO Project Brand Owner Compliance Plan.
Brand Owners seeking co-packer approval under Variance 9 are required to complete the following documents:

- Non-GMO Project Variance 9 Co-Packer Addendum
  > Please complete a separate CoPacker Addendum for each CoPacker that handles your products seeking verification
- Non-GMO Project Brand Owner Co-Packer List
  > Please list all copackers that handle your products seeking verification

**Non-GMO Project Brand Owner Compliance Plan:**

Any production or handling operation seeking verification to sell, label or otherwise represent goods with any Non-GMO Project Verified claim must fill out a Non-GMO Project Compliance Plan.

**Non-GMO Project Product Formula Sheet:**

For each multi-ingredient product processed at your operation seeking Non-GMO Project Verification please complete one Non-GMO Project Product Formula Sheet.

**Non-GMO Project Single Ingredient Product List:**

For each single ingredient product that is repacked by your operation and seeking Non-GMO Project Verification please complete one Non-GMO Project Single Ingredient Product List.

**Non-GMO Project Input Supplier List:**

Please complete one Non-GMO Project Input Supplier List, listing all suppliers of the inputs/ingredients used in products seeking Non-GMO Project Verification.

*Note: A Brand Owner that manufactures or produces its own product should seek verification as a Handler and complete the Non-GMO Project Handler Compliance Plan and profile forms.*

3. **Producers**

**Non-GMO Project Producer Compliance Plan:**

Any producer operation seeking verification to sell, label or otherwise represent good with any Non-GMO Project claim must fill out a Producer Compliance Plan.

**Non-GMO Project Post Harvest Handling Addendum:**

Any producer operation that minimally processes their own crops post harvest and is seeking verification to sell, label or otherwise represent goods with any Non-GMO Project Verified claim must fill out a Non-GMO Post Harvest Handling Addendum

**Non-GMO Project Field Profile Form (FPF):**

Please complete one Field Profile Form for each field seeking Non-GMO Project verification.
**Non-GMO Project Greenhouse or Mushroom Profile Form (GMPF):**
Please complete one Non-GMO Project Profile Form for each greenhouse or mushroom facility/growing area seeking Non-GMO Project Verification. (Note: Only greenhouse or mushroom producers are required to fill out a Non-GMO Project Profile Form)

**Non-GMO Project Single Ingredient Product List:**
For each single ingredient product that is repacked by your operation and seeking Non-GMO Project Verification please complete one Non-GMO Project Single Ingredient Product List.

**Non-GMO Project Input Supplier List:**
Please complete one Non-GMO Project Supplier List, listing all suppliers of the inputs/ingredients used in products seeking Non-GMO Project Verification.

**Non-GMO Project Warehouse Affidavit:**
If you have a storage facility that is storing inputs/ingredients to be used in a Non-GMO Project product please complete a Non-GMO Project Warehouse Affidavit.

**Non-GMO Project Compliance Affidavit:**
Your supplier may fill out a Non-GMO Project Compliance Affidavit to demonstrate Non-GMO Project compliance for either:

a. Downgraded Inputs: inputs that originated in a region where no GM production has been allowed (subject to Standard Committee’s approval)
   or
b. Minor and Micro High Risk Inputs that are the product of a system designed to avoid GMOs.
   or
c. Micro High Risk Inputs that are not exceptions to variance 4. 

4. **Livestock Operations**

**Non-GMO Project Livestock Addendum:**
Any livestock operation seeking verification to sell, label or otherwise represent good with any Non-GMO Project Verified claim must fill out a Non-GMO Project Livestock Addendum.

Livestock Operators are required to complete the following documents based on the types of activities conducted.

Livestock Operations that purchase or mix feed:

- Non-GMO Project Handler Compliance Plan
- Non-GMO Project Livestock Addendum
- Any other documents required for Handler operations (i.e. Non-GMO Project Single Ingredient
Livestock Operations that have pasture or grow feed crops:

- Non-GMO Project Producer Compliance Plan
- Non-GMO Project Livestock Addendum
- Any other documents required for Producer operations (i.e. Non-GMO Project Field Profile Form, Non-GMO Project Greenhouse or Mushroom Profile Form, Non-GMO Project Single Ingredient Product List, Non-GMO Project Input Supplier List)

Livestock Operations that have pasture or grow feed crops AND purchase or mix feed:

- Non-GMO Project Producer Compliance Plan
- Non-GMO Project Post-Harvest Addendum
- Non-GMO Project Livestock Addendum
- Any other documents required for Producer operations (i.e. Non-GMO Project Field Profile Form, Non-GMO Project Greenhouse or Mushroom Profile Form, Non-GMO Project Single Ingredient Product List, Non-GMO Project Input Supplier List)

Operations that only mix or handle livestock feed (no animals):

- Non-GMO Project Handler Compliance Plan
- Non-GMO Project Livestock Feed Addendum
- Any other documents required for Handler operations (i.e. Non-GMO Project Single Ingredient Product List, Non-GMO Project Input Supplier List, Non-GMO Project Product Formula Sheet)

5. **Restaurant Operations**

**Restaurant Addendum:**

Any restaurant operation seeking verification to sell, label or otherwise represent good with any Non-GMO Project claim must fill out a Non-GMO Project Restaurant Addendum. Non-GMO Project includes the following types of verification:

- Verification of the entire restaurant/deli
- Verification of select dishes
- Verification of single ingredients
All restaurant operators seeking verification of the entire restaurant/deli or verification of single ingredients are required to complete the following documents:

- Non-GMO Project Handler Compliance Plan
- Non-GMO Project Restaurant Addendum
- Non-GMO Project Input Supplier List

All restaurant operators seeking verification of select dishes are required to complete the following documents:

- Non-GMO Project Handler Compliance Plan
- Non-GMO Project Restaurant Addendum
- Non-GMO Project Input Supplier List
- Non-GMO Project Product Formula Sheet
B. Inputs

1. High Risk Inputs

Ingredients or inputs that are derived from or contain genetically modified organisms (GMOs), which are grown or produced on a large scale in North America and other parts of the world. 
*Non-GMO Project Standard 2.4.3.*

High Risk Crops currently include:

i. Alfalfa
ii. Canola
iii. Corn
iv. Cotton
v. Papaya
vi. Soy
vii. Sugar Beets
viii. Zucchini
ix. Yellow Summer Squash

Other Categories of High Risk Inputs include:

i. Animal Derivatives
ii. Livestock Production Inputs
iii. Microbes and Microbial Products
iv. Processed/processing inputs and ingredients, and related derivatives, derived from crops, livestock, or microorganisms

Please refer to Appendix B of the Non-GMO Project Standard for a current list of High Risk Inputs, as the list is subject to change.

2. Low Risk Inputs

Crops for which genetically modified versions have not yet been commercialized, and/or for which there are no known or suspected instances of contamination.
*Non-GMO Project Standard 2.4.2.*

3. Non Risk Inputs

Materials that are not derived from biological organisms and are not, therefore, susceptible to genetic modification.
*Non-GMO Project Standard 2.4.1.*
4. Livestock Inputs

Animal products are included in the list of High-Risk Inputs because:

- Animal feed commonly contains High-Risk Inputs;
- Injections of recombinant bovine growth hormone are sometimes used to increase milk production; and
- Other High-Risk Inputs may be used to treat problems encountered in livestock production.

*Non-GMO Project Standard 2.4.3*

a. The following High-Risk Livestock inputs may be excluded from the Verification Process at this time (Variance #8):
   - Vaccines
   - Veterinary Medicines

b. The following High-Risk Livestock inputs may NOT be excluded from the Verification Process at this time:
   - Semen of Cloned Animals

Please refer to Appendix B of the Non-GMO Project Standard for a current list of High Risk Inputs, as the list is subject to change.

**Note:** Seed used to grow crops for livestock feed has a five year transition period to bring all seed into compliance. During the transition period, seeds must be the product of a system designed to avoid GMO’s.

*Non-GMO Project Standard 2.7.1*

c. Honey

Section 2.5.2 of the Standard states:

“[Honey must be] produced by bees whose forage area is free of commercial agriculture involving GM risk crops within a 4 mile radius of hives, provided no other feed is used unless it is compliant with the Non-GMO Project Standard.”

Here is the formal written guidance from the Non-GMO Project:

The compliance of honey with the guidance in section 2.5.2. may be confirmed on the basis of an NGP affidavit signed by the organic certifier, or on the basis of other documentation. In the case of other documentation, such documentation must be approved by the Non-GMO Project’s Product Verification Program Manager.

As per further discussion with the Non-GMO Project, if a participant submits an affidavit that is not signed by the organic certifier, that documentation provided by affidavit could still be sufficient if it shows compliance with the Standard’s requirements for verification of honey stated in Section 2.5.2. The only restriction on an affidavit NOT signed by the organic certifier is that this would need approval by the Non-GMO Project Standard Committee.
5. Packaging

Packaging, textiles and other agriculturally derived mercantile products are eligible for verification but verification is not generally required for these items. The following packaging items are an exception and require verification: tea, coffee, spice, and soup bags, or any other packaging that is directly immersed or combined with liquid for the purpose of making the product available for human consumption.

*Non-GMO Project Standard 1.2.1.13*
C. Input Compliance Documentation

1. High Risk Inputs

High Risk inputs must be tested. To demonstrate the Non-GMO status of a high risk input, compliant test reports must be submitted.

*Non-GMO Project Standard 2.4.3*

If you are verifying input compliance by submitting supplier’s Non-GMO test reports, please ensure that test reports include all items listed in Section E: Product Testing Protocol and Procedures of the Compliance Plan.

*Non-GMO Project Standard 2.4.4 – 2.4.4.5.*

2. High Risk Inputs Exception to Testing Requirements:

High risk inputs that meet one of three exceptions may not require testing. Exceptions are evaluated on a case-by-case basis. To demonstrate Non-GMO Project compliance of an input that meets one of the following exceptions, a supplier affidavit may be sufficient:

*Non-GMO Project Standard 2.6.1.3.*

a. **Downgrading:** Where an input that is normally classified as High Risk is demonstrated to be produced under conditions where the risk does not exist, for example, a crop grown in a country where no GMO production has been allowed an input may be downgraded and may not require testing. *Non-GMO Project Standard 2.5.2.*

Please note that processing aids and substrates do not fall within the scope of the EU non-gmo labeling requirements. Therefore further documentation may be required to demonstrate Non-GMO Project compliance for ingredients containing high risk processing aids/substrates. The decision to reclassify a high to a low risk inputs requires approval from the Non-GMO Project Standards Committee. The Standards Committee has shown strong reluctance to down grade animal products from Europe. In order to prepare for the downgrade case, the Participant will need to demonstrate to the Standards Committee examples of the following:

i. How the region enforces a ban on imports containing GMOs.

ii. Whether the region requires testing before the import is allowed to enter.

iii. Whether testing for GMO content of high-risk commodities (e.g., alfalfa, corn, soy, canola, cotton, sugar beets) has been done.

   If so:
   - What have the results been?
   - Has there been significant GMO content?

iv. Producers would have to provide the following additional information, as applicable:

   - Documentation for the IP system in place;
   - A description of the protocols in place to avoid GMO contamination within the operation;
- Documentation that any reseeding of pasture uses only non-GMO seed.

More information about downgrading a high risk ingredient per Non-GMO Project Standard 2.6.1.3 using relevant source information is available through: http://en.biosafetyscanner.org/index.php

b. **Micro Ingredients:** Micro ingredients represent less than 0.5% of the product.  
   Non-GMO Project Standard 4.5.3.

Beginning May 21, 2019, no product can include more than 0.9% total in non-verified High-Risk Micro Ingredients. Until then, up to 10 micro ingredients can be exempted from the Standard’s requirements with the exception of the following:

i. Viable microbes and their functional components, which replicate their action. Examples include yeasts and dairy cultures.

ii. Microbial products that have no viable microbes, or functional enzymes, but which are not isolates. Examples include cheese, bread, wine, beer and fruit puree.

iii. Enzymes. Examples include Chymosin.

iv. Any added nutrient, vitamin, mineral or other active component contained in a finished supplement product. (Please note, this exception will take effect May 21, 2019).

   *Non-GMO Project Standard Variance #4, Appendix A.*

Micro ingredients can also be applicable to Variance #5, if they are the products of a system designed to avoid GMOs. Examples of such systems are organic certification and other identity preservation systems.  
*Non-GMO Project Standard Variance #5, Appendix A.*

c. **Minor Ingredients:** Minor ingredients represent at least .5% but less than 5% of the product.  
   Non-GMO Project Standard 4.5.2. Minor ingredients can be determined to be compliant with the Non-GMO Project Standard if they are the products of a system designed to avoid GMOs. Examples of such systems are organic certification and other identity preservation systems.  
*Non-GMO Project Standard Variance #5, Appendix A.*

3. **Low and Non Risk Inputs**

Low Risk inputs do not require GM testing, but must be able to demonstrate the Non-GMO status of an input. Such examples of demonstrating the non-gmo status of low risk inputs include: Specification sheets verifying the absence of high-risk inputs, PCR Negative Tests, and or proof that the facility has an IP system to avoid cross contamination with high risk inputs (e.g. organic certificates).

Non Risk inputs require a Specification Sheet or other document verifying the absence of high-risk inputs.  
*Non-GMO Project Standard 2.4.1 - 2.4.2.2*
4. **Major Inputs:**

Major inputs present 5% or more of the product or are a defining ingredient. A defining ingredient is one whose name appears in the name of the product.

*Non-GMO Project Standard 4.5.1*

5. **Spot Purchasing**

Spot purchasing from unverified suppliers should be avoided. Participants must seek out Non-GMO Project Verified inputs and if they are available, and a spot purchase is used instead, the Participant must justify to the Technical Administrator why the verified input was not used.

*Non-GMO Project Standard 2.3.4*

Spot purchases may be allowed on the following basis:

- That they are tested for Non-GMO status upon receipt;
- That they are only purchased from Non-GMO Project Verified ingredients;
- That they are documented and submitted to NSF annually for review.
D. Segregation

1. Split Operations

If an operation is not dedicated to Non-GMO Project Verified production, all inputs intended for the use in Non-GMO Project Verified products must be segregated from all materials that are not compliant to the Non-GMO Project Standard. 
Non-GMO Project Standard 2.2.2.1.

2. Parallel Production

If an operation handles Non-GMO Project Verified ingredients/products and non-verified ingredients/products of the same category, in the same facility, using the same equipment, there is a high risk of contamination and additional segregation measures may be necessary. 
Non-GMO Project Standard 1.3.8

3. Dedicated Operations

If an operation is dedicated to Non-GMO Project Verified production and uses high risk inputs and low risk inputs, segregation is required. High Risk Inputs must be segregated from Low Risk Inputs to prevent any comingling or contamination.
Non-GMO Project Standard 2.4.2.1.

There is a potential risk of high-risk crops contaminating low risk crops. Therefore it is important to segregate the high-risk inputs from the low risk inputs, to minimize the risk.

4. Commingling

If you perform a purge prior to non-gmo product runs please document that a purge is performed and the disposition of the product purged. Please demonstrate the amount of product purged is sufficient to prevent the comingling/contamination.
E. Testing Requirement

1. Overview

Each lot of high risk input is required to undergo a statistically valid sampling and testing at least once post harvest and must comply with the action threshold, as established by the Non-GMO Project Standard.

*Non-GMO Project Standard 2.6.*

Please note that low risk inputs are not required to undergo this testing in order to demonstrate compliance.

2. Action Thresholds

*Non-GMO Project Standard Appendix A, Variance #1:*

a. Human Food, ingredients, supplements, personal care products: 0.9%

b. Seed and propagation Materials: 0.25%

c. Animal feed and supplements: 1.5%

d. Packaging, cleaning products, textiles and other products not ingested or directly applied to skin: 1.5%

3. Meeting the Requirement

a. Sampling plans must be designed to achieve a 90% confidence interval and must occur at least once post harvest 2.6.1.1.1. Note the 90% confidence expresses how well the sample represents the population.

   Technical guidance on sampling plans may be obtained from GIPSA, ISO and GAFTA.

b. Samples must contain sufficiently intact DNA. Materials that are overly processed may be difficult to get a valid quantitative test. In this case you would need to test the precursor ingredient. 2.6.1.1.4.

c. Sampling plans for certified organic livestock operations that commercially purchase feed and that process prior to final processing (e.g. dairy, ground meat, egg mixtures) must include a random selection of farms each quarter. Quarterly sampling of feed for certified organic operations shall be based on testing of a composite sample of high-risk feedstuffs from a representative selection of farms.

*Non-GMO Project Standard 2.7.2.1*
Quarterly Sampling Density:

i. Fewer than 10 farms per region: minimum of 1 farm tested per quarter
ii. 10-20 farms per region: minimum of 2 farms tested per region per quarter
iii. 21-50 farms per region: 10% of farms tested per region per quarter
iv. 51-100 farms per region: 5% of farms tested per region per quarter

d. Sampling plans for non-organic certified livestock operations that commercially purchase feed and do not process products before final processing (e.g. shell eggs, cut meat) must include a quarterly composite testing of feed samples for each shipment of feed purchased by each farmer in the Participant’s operation. The average for all quarterly composite tests must be below the Action Threshold.
   Non-GMO Project Standard 2.7.2.2

e. Feed must be in compliance according to the following life cycle guidelines:
   i. Meat Animals (other than chickens): Starting at the last 1/3 of gestation.
   ii. Chickens: Starting from 2nd day after hatching
   iii. Dairy Animals: For one full year prior to verification

f. Testing must be carried out by an ISO17025 accredited lab.
   Non-GMO Project Standard 2.6.1.1.3.

g. Quantitative Real-Time or Digital PCR tests must meet Action Thresholds.
   Non-GMO Project Standard 2.6.1.1.

h. Qualitative Real-Time PCR tests are acceptable only if the test results are negative with a limit of detection that is .01%. If the qualitative test results are positive, an additional quantitative test would be required.
   Non-GMO Project Standard 2.6.1.1.5.

i. Lateral test strips shall only be used for spot checks and in unblended livestock feed ingredients. Test strips must have a detection that is .01%.
   Non-GMO Project Standard 2.6.1.2 and 2.7.2.1.
F. Acceptable IP Systems

1. Definition

Identity preservation (IP) refers to a system of production, handling, and marketing practices that maintains the integrity and purity of agricultural commodities.

2. Components of an IP system

The system should start with seed. There needs to be proper handling and storage of the IP crop to avoid commingling with another crop. All equipment, such as planters, combines, augers, and elevators and storage bins must be thoroughly cleaned to avoid commingling and contamination.

For example, a crop such as corn requires a proper distance for isolation from other corn because of cross-pollination.

Finally, there must be traceability. Each step in the IP system must be documented using a paper and/or electronic audit trail. The audit trail should be able to trace every step in the IP system – from the receipt of inputs/ingredients to production through the sale of finished goods.

3. NSF recognizes the below certifications and verifications as acceptable IP Systems:

a. USDA National Organic Program (NOP) Organic Certification and equivalent

b. IP Program Certification and Verification
   Examples include: USDA, eurofins, Minnesota Crop Improvement Association

c. ISO 22005:2007 Traceability in the feed and food chain

d. Biodynamic Certification

e. Current Certifications with a Food Safety Scheme that are benchmarked with GFSI
   i. Primus GFS Standard
   ii. IFS PACsecure, Version 1
   iii. Global Aquaculture Alliance Seafood Processing Standard
   iv. Global G.P.P Integrated Farm Assurance Scheme Version 4
   vi. FSSC 22000
   vii. Global Red Meat Standard (GRMS)
   viii. Canadian GAP
   ix. SQF
   x. BRC
   xi. IFS
4. The following systems demonstrate that the participant has an understanding of the elements of a IP system. However further information is required to demonstrate that the IP system ensures that the product is of a system designed to avoid GMOs.

   a. ISO 9001:2000
   b. ISO 22000 (This scheme is not benchmarked with GFSI)
   c. Third Party Certified or Verified Free From Claims (such as Gluten Free, Dairy Free, etc.)
   d. Third Party Certified HACCP Plans
   e. Non GFSI Benchmarked 3rd Party Food Safety Certification and/or Verification
   f. Kosher, HALAL, or Other Third Party Certified Religious Dietary Laws