eve VEGAN®

27.5 Compliance Standards

The Global Standard for Vegan Products and Services

V3.010124

Appendix 27.5

EVE Vegan® Compliance Standards

The EVE Vegan® certification mark contributes to a more sustainable and ethical world by using vegan certification to build animal-free trade and industry.

Liability waiver for translation
If you have any questions about the precise meaning of the information contained in the translation, please the official English version for clarification.

Any deviation or difference in meaning generated by the translation is not binding and has no effect on the certification project.

Document protection
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More Information ?
For more information about EVE Vegan®, visit www.certification-vegan.org, contact us by email at contact@certification-vegan.org or send your request by post to the EVE Vegan® head office in France.

The requirements of this standard are binding and must be met to obtain certification.

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1. Introduction

There are currently no international regulations governing the use of the "vegan" claim for commercial purposes. Consequently, Expertise Vegan Europe has developed its own innovative certification program: the EVE Vegan® certification mark.

By creating its own Compliance Standards, EVE Vegan® seeks to build the regulatory framework that the future needs to progress, namely:

•Regulatory benchmarks for manufacturers, distributors and consumers.

•Rules for the use of terms used to identify vegan products and services.

•Ensuring the reliability of products and services and their regular inspection by an independent body.

The EVE Vegan® certification program is currently voluntary, and use of the brand is strictly reserved for certificate holders.

EVE Vegan® is developing its standard with the aim of gaining the trust of professionals and consumers alike, and becoming a recognized reference in this field. The minimum criteria adopted are in line with the compliance rules validated by the main vegan associations in Europe.

The EVE Vegan® standard has also been developed in compliance with international standards guaranteeing the competence, impartiality and independence of certification bodies.

2. Document objectives

2.1 Generalities

These **Compliance Standards** describe good manufacturing practices and detail the requirements for obtaining the right to use the EVE Vegan® certification mark.

The **Compliance Standards** represents an appropriate normative instrument, as it imposes clear, detailed rules that leave operators no scope for divergent transposition. It defines all the activities required to obtain a product or service corresponding to the defined characteristics.

It must enable each structure to assess its own risks, define the means of control to be implemented and justify them with evidence. This **Compliance Standards** specifies the essential elements of control, while allowing the necessary flexibility for small businesses, as well as adaptations to maintain traditional production methods.

The objectives assigned to this document are:

•To measure and improve overall performance: To have certified professionals adopt the concept of risk control and the implementation of the necessary measures, with a view to ensuring compliance with the scope of certification.

•Depending on the size and type of activity, adjust these measures to the general and specific requirements of the establishment in question (property, operation, cooperative, company, or any other establishment under consideration).

•Guarantee their application while respecting pragmatism and the specificities of the sector.

•Meet customer and client expectations in terms of compliance.

The means of control described in the Operator's quality procedures must serve as a basis for self-inspection as well as for inspections carried out by EVE Vegan®.

In the event that the regulations to which the operator is subject contradict the requirements of the present document, or become so after obtaining certification, the operator is under obligation to inform EVE Vegan® as soon as possible.

2.2 Evolutionary nature
EVE Vegan® undertakes to inform Operators of any changes made to the present Compliance Standards. This document must be considered as a living document, likely to be improved at any time.

We invite users and Operators to always check if an update is available when using the Compliance Standards, as well as the Certification Procedure version (see update date at the beginning of the document).

2.3 Intellectual property rights
The present Compliance Standards, including its textual content and illustrations, is the private property of EVE Vegan®. Any reproduction, in whole or in part, without the prior authorization of its beneficiaries is strictly forbidden.

3. Certification Area

The **Certification Area** consists of the **Certification Perimeter** and the **Certification Scope**.

Certification Perimeter: the organizational units forming part of the Certification.
Certification Scope: the activities covered by the Certification.

3.1 Certification Perimeter
In the case of Factory Certification, verifications of the use of good manufacturing practices relate to the quality system. The Factory Certificate is valid for a maximum of (36) thirty-six months from the date of issue. For the duration of validity, please refer to the applicable Certification Contract.

In the case of Product Certification, checks are carried out on the product's composition, manufacturing process and packaging. A product certificate is valid for (18) eighteen months from the date of issue.

The certification perimeter begins once the raw materials have been harvested. Certification begins with the assembly of raw materials to obtain a finished product, right through to packaging, including outsourced operations. Depending on the requirements of the certification project, the perimeter can be adapted.

3.2 Certification Scope
Candidates for certification may be raw, semi-finished or finished products. These products may be food or non-food.

Candidate services can be contract manufacturing or catering services. These services may be food or non-food in nature.

Certification does not apply to research and development or distribution activities.

The admissibility of all or part of a certification project is examined on a case-by-case basis. Certain projects cannot be accepted due to their very low relevance, such as:
•Cultivated or harvested raw plant products,
•Plant seeds and vegetative reproductive material,
•Unprocessed virgin oils and spices.

Agricultural technologies or products used before harvest for agricultural cultivation are considered outside the scope of certification. As such, they are not subject to any admissibility or declaration criteria.

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3.3 Mixed activity
The Operator is authorized to have a mixed activity, i.e. to produce and market conventional products and services alongside products and services bearing the EVE Vegan® certification mark.

3.4 Relevance
The EVE Vegan® certification mark is relevant and useful if it applies to product categories that traditionally use raw materials of animal origin or are traditionally linked to animal testing.

In order to protect the use of the certification mark, EVE Vegan® reserves the right to refuse a project for lack of relevance. Too little relevance to represent a real vegan alternative constitutes an abuse of language and a source of confusion for the consumer. Projects that are refused will receive a reply with the reason for refusal.

3.5 Manufacturing history
Product certification applies to a predefined product, sold in bulk or packaged. It is possible to register a predefined formula, considered as a finished product independently of its marketing.

Prototypes designed for product development are excluded.

A product manufactured more than twenty-four (24) months prior to the signing of the certification contract will not be authorized to use the EVE Vegan® certification mark.

It is the responsibility of the Operator to ensure that products registered with the EVE Vegan® certification mark comply with the requirements of the present Compliance Standards, both in terms of manufacturing history and quality criteria.

3.6 Right to obtain certification
The EVE Vegan® certification mark can only be obtained and issued to the legal owner of the products or services covered by the certification project. This means any natural or legal person who manufactures a product or has a product designed and manufactured, and markets it under his or her name or brand.

Certification cannot be obtained for an importer, distributor or end-user of a product, with the exception of proof of the right to use or session of the brand concerned.

The EVE Vegan® certification mark is non-transferable to third parties, such as subcontractors or clients, with the exception that the latter have also contracted with EVE Vegan® and joined the certification program.

3.7 Items outside the Certification Area
The Certification Area does not cover any criteria other than those explicitly mentioned in the present document. No claim relating to a criterion outside the scope of certification will be accepted.

4. Certification file

The content of the certification file is detailed in the **Certification Procedure**, of which the present document is appendix **27.5**. In addition, the following requirements apply to the type and quality of documentation:

4.1 File content

The **Certification File** must include, among other things, the following information:

•A description of the product, including the formula, the names of the raw materials and the supplier, the exact trade name of the product, the label, the product code enabling the product to be unambiguously identified. A link can be established between the formula, the raw materials and the label (In the case of semi-finished products, the same requirements enabling the nature and composition of the product to be unambiguously identified apply).

•Data relating to animal experimentation carried out by the Operator to meet the company's internal Research & Development requirements, the legislative or regulatory requirements of third countries, or carried out under global community regulations.

•Finally, in the case of factory certification without a product certification project, the file will be limited to the identification of production areas and factory referents, in addition to the audit report.

4.2 Acceptability and age of documents

The Operator must provide clear, dated and signed documentation that unambiguously identifies the information required. The rules governing the age of documentation are as follows:

Operator's legal identification documents:
•Less than (6) six months old

Product data and certificates:
•Less than (6) six months old

Raw materials data and certificates:
•Less than (5) five years old

4.3 Product labelling

The label of the finished product must be supplied. A provisional version is accepted, provided that the final version is supplied no later than one month after the product has been placed on the market. In the case of bulk products, the label is not required.

4.4 Product photo

A photo of the finished product must be submitted with the application. Otherwise, it must be submitted no later than three months after the product has been placed on the market. In the case of bulk products, a photo of the product in its bulk form will be requested.

4.5 Sample format

The sample format is considered an independent format from the original product and follows the same requirements as the finished product. Its declaration is required in the certification file.

4.6 Packaging items

A full description of the characteristics of the packaging items used must be provided on the Packaging Form provided for this purpose (Declaration of packaging materials used).

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5. Compliance criteria

By "animal" we mean the entire animal kingdom, i.e. all multicellular vertebrates and invertebrates. The term "of animal origin" refers to everything that comes from breeding, slaughter, hunting and fishing. The certification project must meet the following requirements in all respects:

5.1 Product: Generalities

No raw materials of animal origin should be used at any stage of production, processing or packaging of the product to be certified.

5.2 Product: Processing aids

No processing aids of animal origin should be used at any stage of the production and processing of the certified product (including extraction methods, reagents, solvents, bacterial culture media, enzymes, flavoring, fragrances, colorants, etc.).

This includes all added substances not listed on the product label (including tracing agents, filtration agents, biotechnological agents and any other technique involving the use of additives). Production tools and machinery are not considered as such for the purposes of this document.

5.3 Product: Animal experimentation

The development and manufacture of the product must not involve or have involved vivisection or experimentation on animals of any kind, carried out on the company's own initiative or on its behalf, or by parties over whom the company exercises effective control (including exportation and export destination). If such tests have been carried out in the past, a minimum period of seven (7) years must have elapsed without the test being repeated.

5.4 Raw materials: Generalities

The raw materials used in the manufacture of the product must not, at any stage of their production and processing, use raw materials of animal origin.

Raw materials are not required to be vegan-certified. However, certification may speed up the registration process.

5.5 Raw materials: Blends

A product made from blends such as wine and champagne is eligible, provided that the blended sources are subject to the same eligibility criteria as the raw materials.

5.6 Raw materials: Recycled materials

The admissibility of a recycled material is studied on a case-by-case basis. A recycled raw material processed from waste is considered a new material.

5.7 Raw materials: Biotechnology

Raw materials derived from biotechnological processes such as bacterial action, enzymes, yeast and algae must be guaranteed to be free from raw materials of animal origin. Bacterial strains of human origin and recycling from medical waste are acceptable.

The admissibility of a biotechnology-derived material is conditional on obtaining the following information:

- The nature of the strain (scientific name)
- The origin of the strain (plant, animal, human)
- Origin of last substrate used (fermentation medium)
- The date of the last animal sampling of the strain, which must be greater than (36) thirty-six months and not repeated over time.

Any raw material submitted for verification will be assessed on a case-by-case basis, and will be subject to additional requests if necessary.

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5.8 Raw materials: Animal experimentation
The development and manufacture of raw materials used in the scope of certification must not involve or have involved vivisection or animal experimentation of any kind, carried out on the supplier's own initiative or on its behalf, or by parties over whom the company exercises effective control. If such tests have been carried out in the past, a minimum period of seven (7) years must have elapsed without the test being repeated.

5.9 Raw materials: History
Whatever the certification project, the characteristics of raw materials in their version prior to their version marketed by the last supplier are not subject to any admissibility criteria.

5.10 Packaging items
The product's packaging items, whether primary or secondary, must not explicitly (i.e. visible to the naked eye or visible in his last composition) use materials of animal origin (leather, silk, wool, fur, brush hair, etc.).

Primary and secondary packaging must not require glue to be deposited when the final label is added to the product. If yes, the origin of the glue will be assessed (casein-based glue, pork glue, processed beef fatty acids, etc.). Self-adhesive labels and welded packaging of synthetic origin are accepted.

Packaging items are not required to be vegan-certified. However, certification can speed up the registration process.

The completeness of the packaging items used to package the product must be declared in the Certification File in the same way as it constitutes a part of the finished product marketed.

Depending on the certification scope applicable to the certification project, the previous history of packaging items is subject to the same admissibility criteria as raw materials.

Logistical packaging items relating to the transport and storage of the finished product (not for sale to final consumer) are considered outside the scope of certification. As such, they are not subject to any admissibility criteria or declaration.

5.11 Flying labels
It is agreed that any volatile carriers or labels used to affix the EVE Vegan® certification mark to a product should be stored in a secure (locked) area. It is recommended that any volatile labels or media added after manufacture should be considered and managed as a risk by the Operator.

5.12 Cleaning and disinfection products
The cleaning and disinfecting products used are considered outside the scope of certification. As such, they are not subject to any admissibility or declaration criteria.

5.13 Deviation or infringement
In order to accept the definitive validation of a product or service, there must be no ambiguity, unresolved non-conformity, repeated non-conformities or infringements that cast doubt on the operator's ability to meet its commitments over the long term.

6.Animal experimentation

6.1 Animal experimentation: Generalities

The development and manufacture of the finished product must not involve or have involved vivisection or animal experimentation of any kind, carried out on the Operator's own initiative or on its behalf (Research & Development), or by parties over whom the company exercises effective control (including exportation and export destination).

6.2 Animal experimentation: History

Community regulations external to the Operator make the use of animal experimentation compulsory:

- For new food products (pre-requisite for marketing),
- For medical progress, for pre-clinical and clinical safety assessment (pre-requisite for marketing);
- By the European REACH registration program (pre-requisite for placing on the market),
- By the European registration program EFSA (pre-requisite for marketing),
- By other regulations outside the European Union.

To ensure that the history of animal experimentation does not hinder (i) progress, (ii) the Operator's compliance with current regulations, and (iii) reasonable access to certification, EVE Vegan® has set a long-standing loyalty and tolerance threshold. If such tests have been carried out in the past, a minimum period of seven (7) years must have elapsed without the test being repeated.

A certification project, in whole or in part, will not be successful if the rules defined above are not compliant.

6.3 Animal experimentation: in-vitro tests

In-vitro (in an artificial environment) tests carried out to meet legal safety requirements (e.g. oral or cutaneous toxicity testing) are tolerated. In-vivo tests on humans (tests on volunteers) are also tolerated.

6.4 Animal testing: Export

Obligations relating to animal testing also cover the export of the product to a country or territory imposing vivisection or mandatory animal testing prior to marketing.

Practices aimed at withdrawing the certification mark from the product, then marketing it without modification (at least the trade name and formula) while having carried out the animal testing obligations, constitute an infringement punishable by definitive exclusion from the certification mark.

It is the Operator's responsibility to check that export conditions do not constitute an obstacle to marketing before committing to the EVE Vegan® certification program. If this is not the case, no claims can be accepted.

Rules of Use
Compliance Standards

7. Certification mark

7.1 Purpose of the trademark

The purpose of the EVE Vegan® certification mark (registered trademark) is to communicate and contribute to information on the qualities of a product or service in terms of quality control by an independent third party. The materialization of the certification mark provides consumers and companies, from the moment of visualization, with all the guarantees relating to the present **Compliance Standards** and **Certification Procedure**.

7.2 Rules of use

The rules for using the certification mark are detailed in the **27.6 Graphic Charter**. The Operator undertakes to respect all the rules of the graphic charter, in its current version.

No product or service may be marketed with the EVE Vegan® certification mark before a valid certificate or attestation has been issued. The date of commencement of validity will be, at the earliest, the date of validation of the certification project by Certification Department.

The use of the EVE Vegan® trademark on product labelling is not mandatory.

The EVE Vegan® certification mark is non-transferable to third parties, such as subcontractors or clients, with the exception that the latter have also contracted with EVE Vegan® and have joined the certification program for the same or relative scope of certification. This provision applies regardless of the degree of processing of the certified product.

It is the responsibility of the operator to ensure before any printing project that the application of the logo in ® version or TM version is applicable. For further information, please refer to the **27.6 Graphic Charter**.

7.3 Scope of application

Use of the certification mark is authorized only within the strict area of certification. The EVE Vegan® mark may be used on the following media:

- Product sample format,
- Product,
- Product packaging,
- Batch of products,
- Storefronts,
- Printed media,
- Virtual media (website, social networks, video).

7.4 Product batches

Operators are free to compose product batches that include certified products. There are two possible scenarios:

Batch of products comprising only certified products: Use of the certification mark authorized on the entire batch, subject to prior declaration in the Certification File.
Batch of products partially composed of certified products: Use of the certification mark prohibited on the whole batch. Declaration is optional.

7.5 Misleading information

Any statement suggesting that the EVE Vegan® certification mark endorses or recommends a product in any way is prohibited, with the exception of information relating to the certification itself.

Claims relating to the EVE Vegan® certification mark must not be misleading. Claims in the form of text or images must not be used to attribute characteristics to the certification scope that it does not possess: superior nutritional value, absence of contaminants, low ecological impact without proof.

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8. Good manufacturing practices

8.1 Scope of application

The present recommendations constitute qualitative references that operators, manufacturers, restaurateurs, distributors and importers can implement according to their own organizational choices, either by assuming all production with their own resources, or by joining forces with other structures to achieve this.

It is up to the operator to define and implement the organizational, supervisory and coordination procedures required to meet the criteria expected by the EVE Vegan® certification mark, to maintain it over time, and to justify its effectiveness during inspections.

8.2 Responsibilities

The designation of at least one person responsible for managing the **Certification File** is mandatory (internal staff or external person under contract). The person in charge is referred to as the "Referent". This person is responsible for:

- Manage the certification file,
- Apply certification rules,
- Monitor product conformity,
- Control labeling and communication materials relating to the certification mark,
- Guarantee public access to certification information,
- Apply and monitor corrective measures,
- Declare and manage modification of scope,
- Raise staff awareness of the certification process,
- Keep abreast of changes to the standard,
- Prepare the renewal phase, if applicable.

The certification officer must be known throughout the company, and must be able to communicate the directives required to maintain certification to all employees and company players, including suppliers, service providers, subcontractors and distribution networks.

8.3 Mandatory documentation

The Operator should design the documentary architecture of his quality management system, set it up and keep it up to date in line with his organizational structure. An electronic system can be used to prepare and manage all documentation.

Storage and archiving must be organized in such a way as to enable information to be easily retrieved in the event of an inspection.

The Quality management system of the committed Operator should include at least the following elements:

A. Pre-purchase conformity assessment procedure
B. Certification management procedure
C. Risk analysis
D. Cleaning and disinfection procedure,
E. Withdrawal and recall procedure
F. Records relating to **complaints** made by EVE Vegan® and documentation of actions taken.

The Quality management system, in addition to the operating procedures, must include **measures to control risks.** The risk are identified as soon as possible.

Mandatory procedures can be written independently, or can be included as a chapter in an existing procedure.

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Finally, the Operator or his subcontractor must also have a clear and complete archive of documentation and records relating to the certification project: formulas, raw materials and packaging items declared. The quality of the system is assessed on a case-by-case basis, depending on the certification project.

8.4 Purchasing

The raw materials and packaging items used in the certification scope must correspond to the certification acceptance criteria. They must be selected in such a way as to avoid the use of any non-conforming added substances in the form of additives, including carriers for additives, technical agents or preservatives, flavorings, microorganism and enzyme preparations.

A **Pre-purchase conformity assessment procedure** should therefore exist, based on the evaluation and prior selection of the supplier: the establishment of technical clauses such as the type of selection to be carried out, the acceptance criteria, the actions to be taken in the event of a defect or modification, the checking of the age of the documentation and a pre-qualification questionnaire where appropriate.

It is the operator's responsibility to ensure that suppliers are informed about certification objective, so that they themselves can ensure that they provide the required quality, the necessary supporting documents and report any changes.

It is the operator's responsibility to ensure that valid invoices, delivery notes, labeling and certificates are checked at all times when dealing with suppliers and distributors, so as to always guarantee the conformity undertaken.

The operator must **keep available documents enabling third-party control of traceability** and validation of full product conformity at all times:

• The origin, nature and quantities of products manufactured on site (e.g.: manufacturing sheets, dated formula sheets, production reports, dated production operations, delivery notes, batch control certificates, invoices, transport documents for bulk products),

• The origin, nature and quantities of raw materials, ingredients, additives and processing aids (e.g. raw material data sheets, etc.),

• The nature, quantities and finished products stored (e.g. inventory management reports),

• The nature, quantities and recipients of finished products that have left the site,

• Records of conformity checks on raw materials received on site (e.g. purchase invoices, supplier delivery notes, receiving slips),

• All other information such as the procedure for recording cleaning and disinfection operations, communication documents, laboratory analyses, etc.).

8.5 Change management

Changes which may affect the conformity of the certification scope should be organized, approved and carried out by authorized personnel on the basis of sufficient data. The rules for managing changes should be detailed in the **Certification Management Procedure**.

It is agreed that if ingredients and packaging items used in certified products are to be changed, then this change must be declared in advance to EVE Vegan® in order to verify their compliance.

In general, any change relating to the identification of the certified product (name, brand, label), its variants, its composition, its packaging, its production characteristics, must be compulsorily notified to EVE Vegan® in advance in order to check that conformity is still guaranteed.

8.6 Risk analysis

There must be a **Risk Analysis** relating to certification criteria, which identifies and evaluates hazards and the conditions leading to their presence, in order to decide which of them are significant with regard to the safety of certified products. This risk analysis must:

- List the scope of certification and its characteristics;
- Identify and analyze all potential hazards and their critical points related to contamination, confusion, human error, etc.;
- Evaluate their criticality in terms of severity, frequency and detectability;
- Establish priorities for action;
- Determine the necessary means;
- Identify the corrective actions to eliminate hazards or reduce them at an acceptable level;
- Determine the means to be used to verify their application and effectiveness;
- Identify the documentation and records needed to apply the risk analysis over time;
- Schedule periodic reviews, particularly in the event of changes following the collection of information in production or post-production.

8.7 Personnel

The implementation of certification recommendations by personnel is the responsibility of the Operator's senior management. It requires the participation and commitment of personnel from all departments of the company.

Staff should have access to, and comply with, documents relating to operating modes and procedures concerning the scope of certification.

Staff should be encouraged to report any changes, irregularities or other non-conformities that may occur within their area of responsibility.

8.8 Personnel training

It is recommended that initial and regular awareness of the EVE Vegan® **Compliance Standards** and **Certification Procedure** be provided to all relevant personnel and implemented. It is the Operator's responsibility to periodically evaluate the effectiveness of training and instruction programs to ensure that procedures are effectively implemented by staff.

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8.9 Cross-contamination
The adventitious presence of contaminants of animal origin is plausible (unintentional contamination by contact with other products on the production line, during storage or transport).

Consequently, the operator must assess the risks of contamination and do everything in his power to reduce them through **Risk Analysis**. The procedures to be applied are similar to those set out in the regulations governing allergens (gluten, nuts, eggs, milk, etc.). The recommended control objective is an obligation of means to ensure a contamination rate below than 0.1% (1g/kg).

It is recommended to have rooms, production facilities and buildings reserved for the production of certified products. Failing this, production equipment must be thoroughly and properly cleaned according to a **Cleaning and Disinfection Procedure**. Regular monitoring of cleaning frequency and conditions must be documented.

Production scheduling and material flow should be organized to prevent contamination. It is recommended that certified products be produced first, before conventional or contaminated products.

Bulk products should be stored in suitable containers, and under appropriate conditions to prevent airborne cross-contamination.

Unused transfer hoses and accessories should be cleaned and kept dry, protected from airborne contaminants, splashes and other contaminants.

It is recommended that a complete set of used equipment and accessories be reserved for certified products, in order to limit the possibility of contamination. Failing this, production equipment must be thoroughly and properly cleaned to avoid any risk of contamination, as defined in the **Cleaning and Disinfection Procedure**.

Storage measures to prevent cross-contamination should be applied: temporary storage should be prohibited, premises should be isolated, and storage areas should be separated and identified.

Used equipment lubricated with grease of animal origin must be checked or replaced to avoid any risk of contamination.

In accordance with current European regulations on allergens, a statement such as "manufactured in a workshop that uses milk, eggs, nuts, etc...." is authorized on EVE Vegan® certified products.

With regard to incidental allergens, it is recommended to mention on the packaging the words "manufactured in a workshop that uses..." instead of the words "contains traces of eggs, milk, nuts,..." which could confuse the consumer about otherwise vegan-certified products.

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8.10 Processing premises
The premises must be located, designed, constructed, organized and used in such a way as to ensure the protection of the certified product. This means enabling efficient maintenance, cleaning and disinfection, and minimizing the risk of mixing. If minimum hygiene conditions are not met, the certification project may be suspended until corrective action has been taken.

Premises should also be organized and maintained in such a way as to limit access by parasites, insects, birds, rodents, pests and other animals likely to contaminate production.

8.11 Cleaning plan
A **Cleaning and Disinfection Procedure** should exist, detailing at least the order and nature of operations, the time of application and the means of monitoring effectiveness (visual, chemical checks, etc.).

Where equipment is used for the continuous production of the same product, it should be cleaned and, if necessary, disinfected at appropriate intervals.
The risks identified in the **Risk Analysis** must be controlled to achieve the protection objective for each certified product.

8.12 Security of premises
Production areas and the entire site must be secured to prevent intrusion and malicious acts.

8.13 Subcontracting
EVE Vegan® must be informed in advance of any call for subcontractors for the manufacture or packaging of the scope of certification. The identity of the subcontractor must be communicated, as well as the person responsible for managing compliance on behalf of the operator.

It is recommended that the Operator periodically assess the subcontractor's ability to comply with certification requirements. The operator must provide the subcontractor with all the information required to correctly carry out operations in accordance with the expected compliance criteria.

The subcontractor should be required to inform the operator of any changes likely to affect compliance before they are implemented.

The subcontractor should not submit work contracted out to a third party without the operator's prior agreement. Arrangements should be made between the third party and the subcontractor to ensure that all information relating to operations is made available to the Operator.

8.14 Traceability
It is compulsory for each Operator to keep an up-to-date manufacturing register in which he records all events that have occurred and all operations carried out to enable historical control or traceability operations.

The Operator must have a traceability system enabling all links in the chain, from supplier to consumer, to know the history of certified products, from the selection of ingredients through to marketing.

It is compulsory for the operator to develop and implement an internal traceability system if one does not exist at the time of certification.

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Secure traceability (upwards and downwards), including at least the information defined below:
•Identification of ingredients and products at different stages;
•Persons responsible for control;
•Type of inspection, date and results;
•Associated documents and records, enabling traced information and the information contained in each document to be retrieved;
•Measures taken to ensure uninterrupted traceability between the various stages (links between identifiers, for example);
•Delivery notes for ingredients with unique references, enabling the supplier to trace the formula used and check conformity at any time.

The required information may be in plain text or coded. In all cases, it must enable easy identification of the products and not lead to a break in information between two stages.

The recommended archiving period for traceability documents is (5) five years. In all cases, the retention period must be adapted so that traceability records can be made available on request without undue delay, which could compromise a rapid response in the event of a crisis.

8.15 Withdrawal and recall
A **Withdrawal and Recall Procedure** must be in place to ensure the rapid and timely recovery of products with non-conformities, or suspected non-conformities, such as:
•Products that do not comply with EVE Vegan®;
•Products potentially harmful to consumers;

8.16 Transport
It is the Operator's responsibility to ensure storage and transport conditions have complete traceability of products and raw materials in order to avoid any risk of contamination, confusion or mixing.

Where products pass through several sites, identification measures must be taken.

8.17 Complaints
Investigation and follow-up of complaints (from EVE Vegan® or third parties) should include measures to prevent recurrence of the defect. It is the operator's responsibility to organize the handling of complaints, to keep their history up to date and to manage any conflicts in order to find appropriate solutions.

8.18 Treatment of non-conforming products
It is the Operator's responsibility to approve a reprocessing decision aimed at achieving the defined quality if all or part of a batch of finished or bulk product does not meet the compliance criteria defined by the certification.

It is recommended that products with defects be detected, identified, isolated, labelled "non-conforming" and stored in dedicated areas pending a decision if they are likely to affect compliance criteria.

After the investigation, a decision should be taken by authorized personnel, notably in terms of detour, deviation, refusal or holding.

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8.19 Internal audits

It is the Operator's responsibility to carry out periodic internal audits, depending on the size of the company, to check that the Quality management system in place is working, i.e. that the control measures are being complied with on an ongoing basis.

It is also recommended that internal audits be carried out as soon as changes are made to the organization, relocation, new production site, etc.) to ensure that the Quality management system is still capable of achieving the defined objectives.

Definitions
Vocabulary

Audit: Methodical, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which audit criteria have been met.

Blend: Blending of several wines from the same or different origins and from the same or different grape varieties to obtain a single wine.

Batch: A defined quantity of an ingredient, raw material, foodstuff, packaging item or product manufactured and packaged in a single operation or series of operations, such that it can be considered homogeneous.

Batch number: Characteristic combination of numbers or letters that uniquely identifies a batch on labels, batch records, certificates of analysis, etc.

Bulk product: Product that has undergone all stages of manufacture, excluding final packaging.

Contamination: Inadvertent introduction of chemical or microbiological impurities or foreign matter into or onto a raw material or intermediate product during production, sampling, packaging or repackaging, storage or transportation.

Cleaning and disinfection: All the steps carried out between two production runs to ensure that a surface, equipment or material is clean, attractive and free from contamination.

Certification procedure: Procedure aimed at verifying whether the scope of certification corresponds in all respects to the certification criteria and ending, where appropriate, with the issue of a Certificate, or on the contrary, a report indicating the reasons why it cannot be issued.

Deviation: Unforeseen deviation. It may also include non-compliance with approved specifications or any failure of GMP-related systems.

Finished product: A product which, after processing or manufacturing and packaging, is ready for distribution.

Good Manufacturing Practice (GMP)
A set of basic conditions and activities required to maintain a hygienic environment throughout the production chain, suitable for the preparation, production, handling, packaging and release of safe finished products for human consumption (e.g. good vineyard practices, good cellar hygiene practices, good manufacturing practices, including equipment and facility maintenance procedures and programs, pathogen and pest control programs).

Hazard: A hazard is a biological, chemical or physical agent that may have an adverse effect on health or expected quality.

Ingredients : Substances and raw materials used in the manufacture or preparation of products covered by these standards and present in the finished product. Ingredients may be physically transformed (unchanged molecular structure) or chemically transformed (chemical process having modified the initial molecule).

Maintenance: All operations required to keep equipment in a given condition.

Manufacturing: All operations concerning the purchase of raw materials, packaging items, production, quality control, release, storage, distribution of products and the corresponding controls.

Operator: Individual or legal entity holding the right to use the certification mark, or wishing to obtain this right.

Packaging: All the operations, including filling and labeling, that a bulk product undergoes to become a finished product.

Processing aid: Any substance or material, excluding apparatus or instruments, not consumed as a food ingredient per se and intentionally used in the processing of raw materials, foodstuffs or their ingredients to meet a certain technological objective during treatment or processing, which may result in the unintended but unavoidable presence of residues or derivatives in the finished product.

Definitions
Vocabulary

Primary packaging: First product container, with closure.
Production: All operations involved in the manufacture of a product, from receipt of raw materials, through processing, packaging and labeling, to the finished product.
Recall: Recalls are carried out on products with non-conformities that are already on the market: defective products must be recalled. Information campaigns (press, radio, etc.) relay these recall measures to consumers.
Reprocessing: Reworking, at a certain stage of production, of all or part of a batch of product of non-conforming quality, in order to bring it up to the required quality through one or more additional operations.
Risk: Combination of the probability of damage occurring and its severity.
Risk analysis: Systematic use of available information to identify hazards and estimate risk.
Risk management: Process during which decisions are made and measures implemented to reduce risks or maintain them within specified limits are put in place.
Scope of Certification: Product or service covered by the certification project, or covered by actual certification.
Secondary packaging: Any packaging other than the first product container.
Shipment: Shipment of one or more certified finished products to meet a specific request.
Subcontractor: A company carrying out work entrusted to it by another.
Packaging item: Any item used to package a product, excluding packaging for transport or shipment. Packaging items are referred to as primary or secondary depending on whether or not they are intended to be in direct contact with products.
Waste: Any residue from a production or transformation process.
Withdrawal: Withdrawal can take place as long as the product is available in the company but has not yet been sold: the operator then removes it from the production or storage area.

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