

Grass Fed Dairy Standard

Revision 01, November 2019



BORD BIA
IRISH FOOD BOARD



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1 Introduction

1.1 Introduction

The dairy sector in several EU Member States including Ireland, is heavily rooted in grass based production systems at farm level. In today's market there is an increasing opportunity to demonstrate the natural advantage of these ideal climatic conditions for growing grass, and to highlight the farming systems which have evolved to maximise dairy production from grass with little reliance on other feed types to support the nutritional requirements of the dairy animals. Over many years management practices have been developed and adopted by farmers to improve efficiency and performance of animals in a grass based production system.

The Grass Fed Dairy Standard has been developed in response to the demands of the marketplace. Increasingly purchasers are expressing a desire for dairy products that can be classified as Grass Fed. It is no longer acceptable to just declare that a product is Grass Fed, the market requires evidence to support the claim.

This standard has been developed in consultation with relevant stakeholders from the dairy sector including the Department of Agriculture, Food and Marine, Teagasc, and dairy processors.

1.2 General

Bord Bia is accredited by the Irish National Accreditation Board (INAB) to undertake product certification for their schemes in conformity with ISO/IEC17065:2012. Bord Bia operate a series of quality assurance schemes which cover both primary production and processing for the beef, lamb, dairy, pig, poultry, egg, and horticulture sectors. These quality schemes are open to all producers of these products in all Member States provided they are registered with the competent authority and are compliant with all EU and national legislation relevant to the standard.

This standard sets out the Bord Bia specification to classify dairy products as Bord Bia 'Grass Fed'. The Bord Bia term 'Grass Fed' for dairy products is defined under section 1.7. The certification of dairy processors to this standard is open to all dairy processors in all Member States that hold a relevant (food related) ISO17065 or equivalent accredited certificate.

Conformance with this Bord Bia Grass Fed Standard will permit the use of the Bord Bia Grass Fed logo on products included within the scope (see 1.6) of this standard in accordance with the Logo Use Policy.

1.3 Normative references

The following Standard is referred to in the text as an eligibility requirement of farmers supplying milk to be considered under the Grass Fed Standard and it is the source of the data used to calculate the Grass Fed status of the milk.

- Sustainable Dairy Assurance Scheme (SDAS)

1.4 Responsibility

Bord Bia has overall responsibility for the management of the Grass Fed Dairy scheme. This includes maintenance of the internal quality management system, and inspection and certification of processors wishing to use the Grass Fed logo. In order to become, or to remain certified, the approved member must maintain conformance with the standard and with the terms and conditions contained in the Bord Bia Logo Use Policy.

1.5 Objectives of the Grass Fed Standard

The Grass Fed Dairy Standard has been established to:

- To facilitate the marketing of Bord Bia Grass Fed dairy products, both on the domestic and international markets.
- To provide the industry with a standardised, verifiable and robust mechanism to confirm the conformity of milk and milk products meeting the Bord Bia Grass Fed requirements
- To identify and distinguish Bord Bia Grass Fed dairy products to consumers through the use of a unique logo on eligible products.

1.6 Eligibility / Scope

1.6.1 Eligible Products

Products eligible to be included under this standard must be manufactured from milk originating on Bord Bia SDAS certified farms/herds located in Ireland or other Member State, and which have been processed in a processing plant meeting the requirements of this standard.

It is applicable to milk produced from bovines for either direct human consumption or for further processing into consumer dairy products and dairy ingredients.

1.6.2 Eligible Farms (Milk Suppliers)

All dairy farms supplying milk to be processed as Grass Fed must be certified members of the Sustainable Dairy Assurance Scheme (SDAS). The SDAS scheme is open to all dairy producers in all Member States provided they are registered with the competent authority and are compliant with all EU and national legislation comparable or equivalent to those in Ireland and relevant to the standard.

1.6.3 Eligible Processors

The scheme is open to all dairy processors in all EU Member States. Eligible processors must be certified to an ISO/IEC 17065 or ISO 17021 accredited standard such as British Retail Consortium Global Food Standard (BRC), FSSC 22000, ISO 22000, etc. and to have met the requirements of this standard.

Processors based in the Republic of Ireland that wish to be audited to this standard must be members of Bord Bia's Origin Green Programme. Processors in other Member States must be involved in a sustainability programme deemed equivalent.

1.7 Terms and Definitions

For the purposes of this document, the following terms and definitions apply.

Assessment: where used in the Standard means that data will be processed to determine to what extent an animal / herd meets the criteria set out in the Standard.

Audit: where used in the Standard means that a qualified auditor will conduct an audit against the SDAS Scheme Standard or audit against the Grass Fed Dairy Standard.

Bord Bia: the Irish Food Board.

Certification Body: the Body / Committee to which the Bord Bia Quality Assurance Board has devolved responsibility and authority for all certification decisions with regard to membership of the Scheme.

DAFM: the Department of Agriculture, Food and the Marine.

Farm: the land under the control of the herd owner participating in the SDAS scheme and the farm enterprise that is operated by the herd owner whose herd is certified to the SDAS standard.

Grass Fed: the term 'Grass Fed' for dairy products means that the diet of the cow is composed of at least 90% grass or grass forage on a fresh weight basis. The average Grass Fed figure for a group of herds that constitute a pool of milk for primary or secondary processing must achieve an average of 95% on a fresh weight basis

Grass Fed Dairy Model: Teagasc Grass Fed quantification model for dairy.

Herd Number: a unique number assigned to the herd / holding of the keeper of animals.

Pasture Access: animals must have been at pasture a minimum of the national average less 80 days.

Producer: a dairy herd owner with a valid herd number.

Producer Standard: this consists of the criteria as set out in Sections 1 (Introduction), 2 (Scheme Regulations) and 3 (Grass Fed Dairy Requirements), of the Irish Grass Fed Dairy Standard.

Quality Assurance Board: an independent subsidiary Board within Bord Bia which has overall responsibility for policy in relation to the operation of the Bord Bia Assurance Schemes.

Quality Assurance Database (QAD) : the Bord Bia database through which data is managed and used to determine conformance with this standard.

SDAS: Bord Bia's Sustainable Dairy Assurance Scheme

Teagasc: The Agriculture and Food Development Authority.

The Grass Fed Dairy Standard: this standard.

ISO17065/2012: Conformity Assessment - Requirements for bodies certifying products, processes and services

ISO17021/2015: – Requirements for bodies providing audit and certification of management systems

2 Scheme Regulations

This section contains the scheme rules for eligible dairy processors to be approved to use the Bord Bia Grass Fed logo. Approved processors will be required to be currently certified members of the appropriate Bord Bia processor standard (where applicable).

2.1 Approved Farmer Supplier

2.1.1 SDAS Scheme

In order to be eligible to supply product to the Grass Fed scheme the farmer must be a certified member of the Bord Bia SDAS (see 1.6.2) and meet with the Rules 1, 5, & 6 of section 3.3 of this standard.

In order to become a certified member of the SDAS Scheme the herd/farm whether located in Ireland or other Member State must undergo an audit and be found compliant with the requirements of the SDAS standard. For the milk from a certified farm to be processed as Grass Fed the information gathered during the SDAS audit must confirm that the farm system meets the Grass Fed rules 1, 5 and 6 as listed under sections 3.3, and as defined in section 1.7.

A full independent audit is carried out on the farmer's herd every 18 months. When the farmer is deemed to be compliant he/she will be considered for certification under the Scheme.

2.2 Approved Processor (Member)

As stated in section 1.6 dairy processors wishing to use the Grass Fed logo must be certified to a ISO 17065 or 17021 accredited standard relevant to the food industry and must give access to the Bord Bia auditor to review audit reports of that 3rd party scheme where required.

2.2.1 Bord Bia Dairy Processor Scheme

There is no current Bord Bia Dairy processor scheme. Dairy processors are required to be certified to an ISO 17065/17021 accredited standard (e.g. BRC, ISO22000, FSSC 22000).

2.2.2 Grass Fed Standard Approval

The processor's quality management and IT systems must fully support all aspects of the scheme. All documentation, including records, required under the scheme must be established prior to approval, and be maintained on an ongoing basis and made available to the auditor on request.

Where a scheme member ceases to be in conformance with this standard, or where there is any incident relating to Bord Bia Grass Fed product requiring a recall/withdrawal, the processor must advise Bord Bia immediately. Depending on the circumstances, approval of the milk processor may be temporarily suspended or may be withdrawn.

Failure to inform Bord Bia of such an incident will be deemed a violation of the conditions of approval and an automatic withdrawal of the supplier from the scheme will be imposed. Re-entry onto the programme will be considered on a case by case basis, and only where it is proven that the integrity of the scheme will be upheld.

2.3 Approval Process

2.3.1 Registration

Eligible processors can register for the Grass Fed scheme through the members section of the Bord Bia Quality Assurance Database. The approval process should be completed within 2 weeks of receipt of the registration and appropriate fee.

All applicants will be provided with the standard, and be required to acknowledge and agree to abide by the rules of the standard and the Grass Fed Logo Use Guidelines. Applicants will be given training on the requirements of the scheme and provided with the software for verification of Grass Fed product. Updates to the applicant's internal IT system will be necessary to meet the requirements of web-service providers. The cost of these upgrades must be borne by the applicant. Bord Bia will provide assistance to the IT departments of the processor where required.

2.3.2 Supplier Quality Management System Review

In order to be approved to use the Grass Fed logo the processor must provide evidence that the system used to confirm the Grass Fed status of the product functions correctly, and is verified on an ongoing basis. This will be assessed by:

a) Initial On-site Grass Fed Audit:

An auditor will visit the site to observe the operation of the systems in place governing the Grass Fed scheme, and to review the records to confirm that the requirements are being met, and have been complied with for previous batches dispatched.

b) Surveillance Audits:

Surveillance Audits (on-site evaluation) will take place on an annual basis (see 2.4.2).

c) Membership Fee

In general, one fee per applicant/member processing plant will apply per annum. The fees cover the on-audit fee and follow-up plus the costs associated with the review and certification process. The audit fee may vary depending on the complexity of the system and the number of products under the scope as identified during the application process. The fee will be calculated and provided to the applicant/member prior to audit.

The rules concerning membership will be implemented in the same way whether sites are located in Ireland or other Member State.

2.4 Control, Monitoring and Conformance

2.4.1 Control

Overall control of the scheme will be exercised by Bord Bia.

The decision of Bord Bia on any matter relating to the approval process, or to the control or operation of the scheme, is final (subject to the Bord Bia Appeals Procedure which is available upon request).

2.4.2 Monitoring (Surveillance Audits)

Monitoring of the scheme member will be carried out through scheduled (announced) or unscheduled (unannounced) surveillance audits by Bord Bia or its nominated agents.

After initial approval, each participant will be independently audited by Bord Bia at determined intervals. The maximum interval between successive audits will normally be 12 months.

Participants must facilitate auditors and Bord Bia representatives by granting access to the relevant IT systems and records.

Participants must supply any information requested by the auditors relevant to establishing conformance with the scheme. Auditors are entitled to seek access to relevant audit reports to confirm conformance with the appropriate standards.

Please note that all members, whether located in Ireland or other EU Member State, are subject to unannounced audits as part of the scheme's integrity programme (See Section 2.5).

2.4.3 Conformance

Each member is responsible to ensure full conformance with the standard. All requirements in section 3.4 must be complied with.

Bord Bia maintain the right to suspend or withdraw any approved supplier in order to preserve the integrity of the scheme.

There are four finding categories that can result from the on-site audit:

Finding	Definition	Action
Critical	A finding where single or multiple non-conformances and/or breaches of scheme rules pose a serious threat to either product safety or programme integrity	Immediate suspension from the programme until such time as the issue is addressed. Where the issue is not addressed within the agreed timeframe the member is withdrawn from the scheme.

<p>Full Conformance</p>	<p>Full conformance is achieved when there is complete adherence with the requirement.</p>	<p>Continue to monitor trends/ indicators.</p>
<p>Minor Non Conformance</p>	<p>Represents either a management system weakness or minor issue that could lead to a major non-conformance if not addressed.</p>	<p>Each minor NC should be considered for potential improvement and to further investigate any system weaknesses for inclusion in the corrective action scheme.</p> <p>Minor NCs must be closed out within an agreed period (no longer than 1 month).</p>
<p>Major Non Conformance</p>	<p>Based on objective evidence, the absence of, or a significant failure to implement and/or maintain conformance to the requirements (i.e. the absence of or failure to implement a complete Management System clause of the standard); or A situation which would on the basis of available objective evidence, raise significant doubt as to the capability of the Management System to achieve its intended outputs.</p>	<p>Each major NC s must be included in the corrective action scheme.</p> <p>Major NCs must be closed out within an agreed period (no longer than 1 week).</p>

Table 1: Conformance Categories

2.4.4 Non-Conformance Management:

Failure to comply with, and meet, the requirements of the standard, as determined by audit, obliges the Applicant/Approved Supplier to carry out corrective action within a specified period. Depending on the nature and criticality of the non-conformance, a suspension of current approved status, or a ‘Not Eligible for Approval’ decision may be imposed. The Auditor will specify the nature of the non-conformance and indicate the corresponding time-scale for completion of corrective actions (see Table 1).

The Applicant/Approved Supplier must commit to have the problem resolved within the time-scale specified. Depending on the nature of the non-conformance, and the corresponding response, Bord Bia may require an on-site verification of the action taken. On confirmation that effective corrective action has been put in place, the Applicant/Approved Supplier can be considered for approval or renewal of certification.

Failure to provide satisfactory evidence within the specified time-scale may result in withdrawal of approval and removal from the Grass Fed register / database. This will require the immediate cessation of the use of the Grass Fed logo.

2.5 Unscheduled Audits

Bord Bia reserves the right to carry out supplementary unscheduled audits for the purpose of verifying conformance with the scheme, or in order to determine that corrective and/or preventive actions submitted after audit closeout are in place.

Refusal, or repeated failure, to take an unscheduled audit may lead to suspension from the scheme.

2.6 Approval Decisions

The decision regarding approval for each applicant will be made by the Bord Bia certification committee. This decision will be made based on conformance with the requirements of the standard, however, other factors (such as failure to meet regulatory conformance, food safety requirements, scheme history, or inability to provide sufficient or appropriate access to information) may be taken into consideration in arriving at the approval decision.

2.7 Appeals

The supplier may appeal decisions in relation to approval.

Bord Bia's Appeals Procedure will be followed, and where necessary, the matter will be referred to Bord Bia's Appeals Committee. The decision of Bord Bia's Appeals Committee is final, however, this does not affect the Participant's right to refer the issue to the Ombudsman for consideration.

Contact can be made at:

Office of Ombudsman, 18 Lower Leeson Street, Dublin 2;

Tel. 01-6395600; Fax. 01-6395674

Email: ombudsman@ombudsman.gov.ie

Website: www.ombudsman.gov.ie

3 Dairy Grass Fed Requirements

3.1 Background

The Grass Fed Dairy Standard sets out the criteria that must be adhered to for milk from individual farms, and for milk pooled for primary processing, to be classified as Grass Fed. The standard relies on the Grass Fed quantification model developed by Teagasc and deployed in the Bord Bia Quality Assurance Database to determine conformance. The numerical value of the 'Grass Fed figure' for individual farms assessed will be based on a three year rolling average Grass Fed figure for that farm. Where data for an individual year is absent a default value will be entered. This default value will be determined by the figure calculated annually by Bord Bia using data gathered through SDAS.

3.2 Grass Fed Dairy: Farm Verification

3.2.1 Grass Fed Dairy Eligibility Criteria

At a minimum the herd producing milk for use in Grass Fed product must be an SDAS certified herd whether located within Ireland or another Member State.

Using the Grass Fed Dairy Model and Bord Bia web-based software, the processor must make ongoing assessments of the milk entering each batch to assess the Grass Fed status.

These assessments will be conducted by the processor using the integrated database software (Grass Fed Dairy Model) provided by Bord Bia. This software identifies the farms whose milk can be recognised as Grass Fed.

3.3 Grass Fed Dairy Specification

Rules 1 to 6 below are the basic eligibility requirements for Grass Fed milk.

Rule 1 Herds must be certified members of the Sustainable Dairy Assurance Scheme to be considered for assessment against the Grass Fed Standard.

Rule 2 The assessment of conformity (Grass Fed status) must be completed using the Grass Fed Dairy Model.

Rule 3 The assessment must be completed using data collected during SDAS farm audits and stored on the Bord Bia Quality Assurance Database.

Rule 4 The average Grass Fed figure for a group of herds that constitute a pool of milk for primary or secondary processing must achieve a weighted average of 95% on a fresh weight basis

Rule 5 The minimum acceptable Grass Fed figure for an individual herd to qualify as Grass Fed is 90% on a fresh weight basis.

Rule 6 Animals must be permitted to graze outdoors on grass for a substantial part of year (See 'Pasture Access' in Definitions). For every product batch dispatched a

corresponding 'Grazing Days Report' will be generated and will be accessible online to the processor.

3.4 Audit Requirements: Grass Fed Dairy

The following requirements will be assessed for conformance during audit.

- a) The Processor must identify the management and supervisory staff with responsibilities for the identification, segregation and traceability of Grass Fed product.
- b) There must be a documented and effective system / procedure (based on the results of the verification and as per the 6 Rules listed under 3.3) which details how the processor identifies, segregates and confirms the Grass Fed status of the milk prior to pooling.
- c) The system / procedure must permit a reconciliation to be carried out that clearly demonstrates that only Grass Fed product was sold as Grass Fed.
- d) The Processor must submit complete and accurate details of each Herd Number and associated milk volume collected (in litres) for every supplier within a batch to Bord Bia (to determine if it meets the Grass Fed requirements).

Note: Processors are requested to use the Bord Bia Grass Fed webservice to submit this information.

- e) The Processor must record the Grass Fed status of the batch (which will be returned by Bord Bia) and where it has been determined that the batch does not meet the Grass Fed requirements then it must not be mixed with any product intended to be sold as Grass Fed.

Note: Processors are requested to use the Bord Bia Grass Fed webservice to receive this information.

- f) Grass Fed product must be clearly identifiable throughout the process must not be mixed with non-Grass Fed product at any stage.
- g) Labels carrying the Grass Fed logo which are being used, or have been in use, must be retained for a period in line with the requirements of S.I. No. 369 of 2006 and made available for review during audit where applicable.
- h) The Processor must conduct verification checks at least twice annually on the system to ensure that it is functioning correctly. Where an issue is identified during these checks a root cause analysis must be conducted and corrective action put in place.
- i) The use of the Grass Fed logo on labels or promotional material must ensure that these are used appropriately in accordance with the Bord Bia Policy on the use of the Grass Fed logo. All logo uses must be approved through the online logo approval system. See Bord Bia Logo Use Policy for further information.

