VISPS Smart Farm Verification Program and Standards

Version 2.1

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Introduction to the VISPS Smart Farm Verification Program

The VISPS Smart Farm Verification Program was developed by a group of academia and agricultural businesses that understood consumer preference and demand for Non-GMO foods, and for foods that exceed Non- GMO standards. Consumers are keenly interested in food quality, sustainability, and wholesomeness. Such consumers want reliable information about foods produced without genetic engineering technology that employs man-made genes, chemical pesticides, and chemical fertilizers. Today's consumers are rightfully concerned about the effects of agricultural mass-production methods and its effects on long-term health and the environment. These customers are educated about the effects of the long-term use of the GMOs, and chemical fertilizers, pesticides and herbicides on the resulting decline of the beneficial pollinators, butterflies, birds and wildlife within our environment.

More important, consumers are demanding informed choices in food and comprise a significant and growing segment of the food market. They will pay premiums for sustainably-produced, wholesome, natural foods, such as those that are non-GMO, derived without harsh chemicals, and which preserve natural, healthful characteristics. These consumers place a high value on reliable information about food and will pay premiums when they are confident about the attributes of their food.

The collaborative group of academia and agricultural businesses understand consumers' desire to "know" their food and believe that farm products need to meet those expectations. They also recognize that the value proposition in a confident food supply goes both ways – to knowledge-driven consumers and to farmers with the skill and dedication to produce the right products. This deep understanding of the food-to-table process and consumer demand was the driving force behind the VISPS Smart Farm Verification Program.

The VISPS Smart Farm Verification Program adds value to farm products by employing sound, reliable methodologies for verifying products that are non-GMO, and those that eliminate chemical pesticides, herbicides and chemical fertilizers. VISPS Smart Farm products are made by utilizing best-in-class natural methods and resources to produce wholesome food while preserving soil health while achieving enhanced crop yields.

The VISPS Smart Farm Verification Program provides farmers with a vigorous system for the production of desirable foods and consumers with a reliable benchmark for their natural food purchases. The VISPS Smart Farm Verification Program is built on two key pillars:

- Solid standards based on years of experience and research
- The VISPS Smart Farm certification mark that signals compliance with the standards and communicates trust in the market

VISPS Smart Farm growers are certified as meeting or exceeding the VISPS Smart Farm Standards. Achieving verification permits the use of the VISPS Smart Farm verification mark on eligible products.

For agricultural crops, VISPS Smart Farm Verification is available for three VISPS classes:

- “Non-GMO” Standards (NGO)
- “HC Free” Standards (HCF)
- “Transitional-to-Organic” Standards (TTO)

For livestock, VISPS Smart Farm Verification is available for two VISPS production methods:

- “Non-GMO” Standards (NGO)
- “Natural” Standards (NAT)

Each class is subject to separate, exacting standards, and each will be differentiated with distinct marking requirements.

Besides the crops and livestock programs, the VISPS Smart Farm Verification Program also offers verification for on-farm and contract hauling of VISPS Verified products through VISPS Trucking verification.

Purpose of the VISPS Smart Farm Verification Program

The VISPS Smart Farm Verification Program is a verification system that applies tested and reliable verification methodologies for certifying products that are (i) non-GMO, and/or (ii) produced without harmful chemical herbicides, insecticides, fungicides, and fertilizers, and/or (iii) transitioning from conventional chemical-assisted production into organic production.

1. Methodology.

The VISPS Smart Farm Verification Program will provide compliance oversight to ensure that customers are receiving VISPS verified products that meet or exceed the VISPS Smart Farm standards for each Class of certification.

The VISPS Smart Farm Verification Program has adopted the USDA National Organic Program definitions and standards, and as points of reference for Genetically Modified (or Engineered) Organisms, organic methods, and related production activities. These definitions and standards also define the standards for each VISPS Class so VISPS Smart Farm products may take advantage of increasing levels of certification.

VISPS Smart Farm Verification Program employs five major methods of compliance:

1. **Application submission.** This step includes submission of a VISPS System Plan (VSP) along with an updated farm plan annually, or a VISPS System Livestock Plan (VSLP).
2. **VISPS Initial Review.** A review by a VISPS Administrator to determine the applicant's ability to comply with the VISPS Smart Farm Standards.
3. **On-Farm Evaluation and Assessment.** A VISPS Inspector schedules and completes an on-farm evaluation and assessment for compliance to the VISPS Smart Farm Standards. Components of evaluation are conducted according to the VISPS class(es) selected by the applicant. Supporting documentation is reviewed at this stage.
    a. Applicants requesting HCF or TTO verification must complete on-farm assessments. Annually, at least of 20% of HCF applicants will be randomly selected for on-farm assessments. All TTO applicants will have to complete an on-farm assessment annually.
    b. Applicants requesting NGO verification will complete an online audit through the VISPS software.
4. **Product Testing.** Products will be tested by an approved laboratory and supporting documentation reviewed by the VISPS Administrator, depending on the VISPS class(es) selected by the applicant.
    a. Supporting documents review and lab testing for every Lot Number will be the criteria to verify applicants as compliant with NGO standards.
    b. Random non-GMO testing of the lower risk "Specialty Crops" will be a component of the VISPS Smart Farm Verification Program. Commercialized Specialty Crops known to be genetically modified will be subjected to more frequent sampling than the lower risk Specialty Crops. Examples of the Specialty Crops subjected to more frequent testing would be potatoes, beets, summer squashes, and others that would be subjected to cross-pollination from GMO Specialty Crops.
5. **VISPS Smart Farm Mark Usage.** Successful applicants will receive licensing for the VISPS Smart Farm Mark. Periodic review of VISPS Smart Farm Mark usage will be conducted to ensure compliance with licensing and correct usage.
    a. Only products certified through the VISPS Smart Farm Verification Program are eligible to use the VISPS Smart Farm Mark.
    b. Marketing support for the applicant's VISPS Smart Farm products is available.

2. Scope of the VISPS Smart Farm Verification Program

VISPS Scope and Activities		
Activity	**Explanation**	**Eligibility**
Agricultural Production of Crops	Included farm production, harvest, and on-farm storage of plant based crops on the farm.	Yes; VISPS System Plan (VSP) and Monitoring Software supplied by the VISPS Program.
Off-Farm Storage	Includes, but not limited to: grain bins, bulk bins, gravity wagons, and walk-in coolers & freezers maintained off the farm production area.	Yes; VISPS System Plan (VSP) and Monitoring Software supplied by the VISPS Program.
Farm-Owned Trucking	Includes, but not limited to: farm-owned bulk tractors, trailers, cars, trucks, and product trucks.	Yes; VISPS System Plan (VSP) and Monitoring Software supplied by the VISPS Program.
Contract Hauling	Includes, but not limited to: contract truckers, common carriers, and cooperative food distributors when the farmer retains ownership of the food products.	Yes; VISPS System Plan (VSP) and Monitoring Software supplied by the VISPS Program. Note: additional documentation is required (VISPS Trucking Verification)
Minimally Processed Agricultural Products	Included harvesting and minimally processing methodologies, including but not limited to cleaning and sanitizing the equipment and minimally processing plant products.	Yes; VISPS Handling System Plan (VHSP) and Monitoring Software supplied by the VISPS Program.
Packaging and Labeling of Products	Includes packaging and labeling of products owned and managed by the VISPS client.	Yes; VISPS System Plan (VSP) and Monitoring Software supplied by the VISPS Program. All packaging and labeling must be approved by the VISPS Administrator.

At this time, the VISPS Smart Farm Verification Program is not accepting applicants for multi-ingredient products involving or those requiring complex processing. For example, the VISPS Smart Farm Verification Program is not evaluating products including more than one farm-produced ingredient, or which require multiple complex processing steps, such as introduced colorants and flavorings, enzymatic processing aids, steaming with steam boilers, etc.

3. VISPS Smart Farm Terms and Definitions

VISPS Smart Farm Administration utilize the following terms and definitions.

Animal Protein Products: Processed food products derived from livestock; including, but not limited to: livestock carcass cuts; ground livestock products; smoked livestock products (bacon, ribs, etc.); and other minimally processed livestock products. Poultry eggs are included in the definition of animal protein products.

Audit Trail: Documentation records sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as VISPS compliant.

Biologicals: Input products produced using biologics as the basis for the final product. Biologics. All viruses, serums, toxins, and analogous products of natural or synthetic origin, such as diagnostics, antitoxins, vaccines, live microorganisms, killed microorganisms, and the antigenic or immunizing components of microorganisms intended for the diagnosis, treatment, or prevention of diseases of animals.

Buffer Zone: An area between the VISPS verified Production Operation, or portion thereof, and any adjacent area not maintained as VISPS compliant. A buffer zone must be sufficient in size or other features to prevent potential unintended overspray or other contact by prohibited substances applied to adjacent land areas with the VISPS verified Production Operation.

Clean-Out Procedures: Written procedures implemented to protect the integrity of the VISPS verified products. Such procedures should be detailed enough to describe the specific methodology of cleaning the farming equipment, transport trucks or rail cars, and/or processing facilities equipment that has direct contact with the VISPS verified products. Monitoring must be implemented and records maintained to verify that the cleaning procedures are satisfactory to maintain such integrity of the product; when it has been determined that the original cleaning procedure could not preserve VISPS integrity, a secondary back-up plan must be implemented so the equipment has been cleaned sufficiently to preserve VISPS integrity.

Commingling: Physical contact between VISPS verified and non-VISPS verified agricultural products during production, processing, transportation, storage or handling of the VISPS verified products.

Contamination: Direct or indirect physical contact of the VISPS verified product, packaging of the VISPS product, or transportation of the VISPS product with any prohibited substance.

Farm-Produced Products: Plant-based products obtained directly from farm production. For example, Farm-Produced Products would include the whole commodity grains and seeds, whole fresh horticultural crops, nuts, and any other plant-based production as defined under the Agricultural Improvement Act of 2018, P.L. 115-334.

Feed (including Feedstuffs or Feed Rations): Edible materials consumed by livestock for their nutritional value. Feeds may be concentrated feed rations comprising grains and feed additives,

roughages (hay, silage, fodder, or pastures. The term, “feed,” encompasses all agricultural commodities, including pasture ingested by livestock for nutritional purposes.

Feed Additive: A substance added to feed in micro quantities to fulfill a specific nutritional need; i.e., essential nutrients in the form of amino acids, vitamins, and minerals.

Feed Supplement: A combination of feed nutrients added to livestock feed to improve the nutrient balance or performance of the total ration and intended to be: (i) Diluted with other feeds when fed to livestock; (ii) Offered free choice with other parts of the ration if separately available; or (iii) Further diluted and mixed to produce a complete feed.

Fertilizer: A single ingredient or multiple ingredient, blended substance containing one or more recognized plant nutrient(s) which is used primarily for its plant nutrient content and which is designed for use or claimed to have value in promoting plant growth.

Field: An area of land identified as a discrete unit within a Production Operation.

Forage: As adopted from the USDA National Organic Program definitions, “Vegetative material in a fresh, dried, or ensiled state (pasture, hay, or silage), which is fed to livestock.” Forage does not include grain.

GMO or Genetically Engineered Crops: The VISPS Smart Farm Verification Program adopts the definition specified in the implementing regulations of the Organic Foods Production Act of 1990, codified at 7 U.S.C. § 6501 et seq. (commonly known as the National Organic Program (NOP)), for Excluded Methods, 7 C.F.R. § 205.2:

> A variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include cell fusion, microencapsulation and macro-encapsulation, and recombinant DNA technology (including gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology). Such methods do not include the use of traditional breeding, conjugation, fermentation, hybridization, in vitro fertilization, or tissue culture.

Grass-Fed Livestock: As adopted from the definition promulgated by American Grass-Fed Beef, “All livestock production must be pasture/grass/forage based. Grass and forage, will be the feed source consumed for the lifetime of the ruminant, except milk consumed prior to weaning. The diet will be derived solely from forage comprising grass (annual and perennial), forbs (e.g. legumes, Brassicas), browse, or cereal grain crops in the vegetative (pre-grain) state. Livestock may be fed hay, haylage, balage, silage without grain, forage products, crop residue without grain, and other roughage sources while on pasture.”

Harmful Chemicals: Chemicals deemed by the VISPS Administrator or the VISPS Standards Committee to cause unreasonable negative effects on the environment, even if used according to common practices or product instructions.

High Risk Crops: Genetically modified crops grown on a large scale in North America and other parts of the world, for example, corn, soybeans, and cotton. Included in high risk assessments are livestock products because animal feed commonly contains high-risk crops. Likewise, vaccines are sometimes produced using genetically engineered processes and injections of recombinant bovine growth hormone (rGBH) are sometimes used to increase milk production. Livestock. Any cattle, sheep, goats, swine, poultry, or equine animals used for food or in the production of food, fiber, feed, or other agricultural-based consumer products; wild or domesticated game; or other non-plant life.

Inputs. Any material, product, or substance used in the production or processing of the VISPS verified product to enhance some portion of the final VISPS verified product. For example, inputs may include, but are not limited to: Fertilizers, Soil Amendments, Biologicals, Cleansing and/or Sanitizing Agents, Pests, Weeds, or Disease Control substances or any other substance used in agricultural production. Other inputs would include unprocessed agricultural products such as whole seeds, vegetables, grains, herbs, and other fresh foods used as a component of a final VISPS verified product.

Inspection: The act of examining and evaluating the application of a Production Operation or Processing Facility to determine compliance to the VISPS Smart Farm Standards. Inspection might include: review of paperwork, an audit of the audit trail documentation, on-site physical inspection of the Production Operation, Processing Facility, or any other act that the Administrator deems necessary to issue the VISPS Smart Farm certificate.

Livestock Processing Facility: A facility that manufactures feeds to be fed to livestock, or that processes livestock animal protein products for human consumption. The processing facility must also be VISPS verified so the livestock products can be marketed as VISPS Smart Farm, and must meet all state and federal regulations applicable to the processing requirements.

Lot Number: A unique numeric or alphanumeric identification system that provides the methodology to trace a VISPS verified product from time of the seed or plant being placed into the field, through production and storage of the product, through shipping and processing of the final product, and anywhere in the system to the time of legal transfer of ownership of the VISPS verified product.

Low Risk Crops: Refers to Specialty Crops as defined herein and other plant-based crops for which genetically modified versions have not yet been commercialized, or for which there are no known or suspected instances of GMO contamination.

Minimally Processed Agricultural Products: Any further-processed products with raw agricultural ingredients within the final product. The Minimally Processed Single Ingredient Products may be produced by either mechanical or physical methods of production or extraction. For example, raw agricultural ingredients that are minimally processed would include, but not limited to: Whole or Chopped Grains, Seeds, Hay, Chopped or Diced Single-Ingredient Vegetables.

Minimally Processed Agricultural Products Processing Facilities: A facility that performs activities on products to change or preserve a Minimally Processed Agricultural Product.

Pasture: As adopted from the USDA National Organic Program definitions, "Land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources."

Pasture-Based Livestock: Livestock must be given year-round access to Pasture, but may be temporarily confined during stress periods such as, inclement weather, illness, birthing, and during newborn stages of life. Temporary confinement may also be approved for such temporary activities such as milking, clipping, and other day-to day farm management activities.

Plant-Based Products: Whole commodity grains and seeds, grass and legume-based products, and products derived therefrom. Includes Specialty Crops, as defined by the Specialty Crops Competitiveness Act of 2004, P.L. 108-465, as amended by the Agricultural Act of 2014, P.L. 113- 79 (commonly called the Farm Bill) as "fruits and vegetables, tree nuts, dried fruits, horticulture, and nursery crops (including floriculture)."

Processing Facilities: A facility that performs activities on agricultural products to change or preserve the product.

Production Operation: A person or entity engaged in growing, cultivating, raising, and/or producing agricultural products and which is susceptible to being reasonably viewed as a complete, stand-alone enterprise. For example, a farm or ranch would typically be a Production Operation, whereas a cooperative of farmers would comprise multiple Production Operations.

Prohibited Substance: Any material, product, or substance not expressly listed as allowed by VISPS Smart Farm Standards.

Parallel or Split Operation: A Production Operation that produces both VISPS Verified and Non-VISPS Verified products on the same operation. A Parallel and Split Operation may produce VISPS, Non-VISPS, and Certified Organic products on the same operation.

Records: Any information in written, visual, or electronic form that documents the activities undertaken by a producer, processor, or the VISPS Administration to document compliance to the VISPS Smart Farm Standards.

VISPS Administrator: An independent company that implements the VISPS Smart Farm Verification Program.

VISPS Inspector: A third-party inspector, or inspector authorized by a VISPS Administrator, that possesses the education and skill to inspect VISPS Smart Farm applicants to verify compliance with VISPS Smart Farm Standards.

VISPS Smart Farm Mark: The mark identified in APPENDIX 4, which is the subject of a registration application with the U.S. Patent and Trademark Office (USPTO Application Number 87930098).

VISPS System Plan (VSP): A written management plan of a Production Operation or Processing Facility accepted by the VISPS Administrator for all agricultural production activities or processing activities specified by the VISPS Smart Farm Standards.

VISPS Smart Farm Standards: The standards specified for certification as a VISPS Smart Farm.

VISPS Smart Farm Products: Products certified to comply with the VISPS Smart Farm Standards in effect during certification. A certified applicant will receive updated VISPS Smart Farm verification annually upon showing that all standards are met and remain in compliance.

VISPS Standards Committee: Industry professionals, VISPS Administrators, and technical consultants appointed by VISPS stakeholders that developed and maintains the VISPS Smart Farm Standards.

4. VISPS Smart Farm Standards – Crops

This section specifies the standards for VISPS Smart Farm verification for agricultural crops. Each VISPS Class contains additional standards which apply to the particular Class as defined below.

Seeds

- **A.** GMO seeds must not be used in any VISPS Smart Farm verification.
- **B.** Individual seed requirements are listed separately under each VISPS Class.
- **C.** Non-GMO seeds (or other seed requirements) must be verified by copies of the seed tags, and/or a statement must be supplied from the seed supplier stating that the seeds have been produced without GMO methods (or other seed requirements).
    - **i.** If non-GMO seed status cannot be verified by seed tags or a statement of the seed supplier, the VISPS Administrator may allow an untreated seed sample for that specific variety to be provided by the supplier for a GMO test. One sample should be sent to the VISPS Administrator, and one sample should be sent to the approved laboratory.
- **D.** Invoices must be submitted that corroborates that the seeds as portrayed by the seed tags have been purchased in sufficient amounts to plant total acres in the fields.

Buffers

- **A.** Buffer Zone areas must be maintained on the farm sufficient to prevent Contamination of VISPS Fields chemical or GMO pollen drift. Such Buffer Zones could include natural buffers, such as tree lines, hedges, roadways, rivers, creeks, etc. that are in place to prevent unintended drift onto the VISPS verified crops.
- **B.** When natural buffers cannot prevent Contamination, additional buffers must be established by the applicant. Such buffers might include leaving established grass strips that are not harvested, or from commercial cash crops harvested separately from VISPS

verified products and sold as non-VISPS verified product. Sufficient monitoring records must be maintained to document sale of Buffer Zone crops as non-VISPS crops.

Farm or Facility Maps

A. Farm maps must be submitted to show the specific details of the fields to be verified, including field numbers (identified by township and range), acres in the fields, current crops in the fields, surrounding crops in the fields, and any necessary buffer zone areas.

B. Farm maps should be obtained from your local USDA Farm Service Agency office, or some other official mapping service that officially documents the acres and township and range of the fields.

- **i.** Optionally, fields can be mapped online using the VISPS Software.

C. Farm maps may either be attached to your VISPS on-line application; or mailed to the VISPS Administrator; or may be scanned and emailed to maps@vispsverified.com.

Clean-Out Procedures

A. Clean-out procedures must be developed, implemented, and documented for all direct contact equipment used for both VISPS Smart Farm products and non-VISPS products. The clean-out procedures must prevent Contamination from prohibited substances and Commingling of VISPS Smart Farm products with Non-VISPS products.

B. All equipment used in a Production Operation used for both VISPS Smart Farm products and Non-VISPS products must be cleaned including, but not limited to: planters, tractors, cultivators, combines, gravity wagons, auger systems, grain bins, trucks, and other equipment used by the operation for both VISPS Smart Farm and Non-VISPS products.

C. All equipment used in transporting both VISPS Smart Farm and Non-VISPS products must be cleaned, including but not limited to: auger systems, hopper bottoms trucks, gravity wagons, rail cars, or any other equipment and transport systems used in the transport of both VISPS Smart Farm and Non-VISPS products.

D. Before implementing a procedure as part of a VSP, the procedure must be presented to the VISPS Administrator for approval.

E. Adequate monitoring records must be maintained to verify that the cleaning procedures have been implemented and will prevent Contamination and Commingling of VISPS Smart Farm products.

F. When monitoring the equipment and the equipment is shown to not be cleaned, another cleaning procedure must be implemented and documented on the monitoring records. The outcome of the second cleaning procedure must be documented on the monitoring records.

Traceability

A. All VISPS Smart Farm products must have the ability to be traced through the full process from seeds planted in the fields to legal transfer of final products.

B. All VISPS crop products must be identified with a Lot Number which permits the product to be traced from inception to sale and physical transfer of the final product. Crop products Lot Numbers must enable the product to be traced back to the specific seed and field in which the seed was planted through production, and ultimate physical transfer of the crop product to a purchaser of the final product bearing the VISPS Smart Farm mark.

- **i.** Lot numbers for crops sold directly from a field must follow the following format: VISPS ID – Farmer Initials – Field Number – Crop Type Identifier – Crop Year – Load Number. For example, 175-JD-2-S-19-1 would indicate a grower with the VISPS ID 175, name John Doe, field 2, crop soybean, year 2019, and load number 1.
- **ii.** Only crops sold as HCF and TTO may be sold directly from a field. Due to required testing, NGO crops must be stored in a bin before sale.
- **iii.** All field lot numbers must be recorded in the VISPS online software

C. If a bin or storage container is used to store VISPS products from more than one field resulting in a blended VISPS product, a separate Lot Number must be created for the bin or other storage container that can be traced to the individual field lot numbers through shipping and final legal transfer of VISPS products; thus closing any gaps in the traceability chain.

- **i.** Lot numbers for crops stored in a bin or storage container must follow the following format: VISPS ID – Farmer Initials – Acres of Each Field Represented by Lot (multiple fields can be separated by a period) – Bin Identifier – Lot Separation Letter for Bins with Multiple Lots – Crop Year. For example, 175-JD-250.150-Bin 1A-19 would indicate a grower with the VISPS ID 175, name John Doe, a 250 acre and 150 acre field blended in Bin 1 (bottom lot in bin), and crop year 2019.
- **ii.** Maximum lot size for a bin or storage container is 5,000 bushels. For bins that hold over 5,000 bushels, letter identifiers may separate multiple lots in the bin. Letter identifiers begin with A as the bottom of the bin, and progress every 5,000 bushels until the bin is full.
- **iii.** All bin lot numbers must be recorded in the VISPS online software.

Inspections

A. VISPS Smart Farm applicants must allow an on-site inspection of their operation by a VISPS Inspector, scheduled with a designated representative during normal business

hours. The inspection must be scheduled while crops are still in the fields. Specific inspection requirements for verification levels are as follows.

i. VISPS Smart Farm applicants for NGO: There will be no on-site inspections of Production Operations requesting only NGO verification; excepting in the case of a communication being received about a quality issue or concern that the NGO verified operation has used GMO seeds or any other prohibited substance and farming methodology on the operation.

ii. VISPS Smart Farm applicants for HCF: All Production Operations requesting HCF are subjected to a randomly selected on-site inspection by a VISPS Inspector. At a minimum, 20% of all HCF operations will be inspected annually. An additional inspection will be scheduled if a call is received about a quality issue or concern.

iii. VISPS Smart Farm applicants for TTO: All Production Operations requesting TTO will be subjected to an annual on-site inspection by a VISPS Inspector to be scheduled with the operator during normal business hours. An additional inspection will be scheduled if a call is received about a quality issue or concern.

Product Sample Testing

All Production Operations and Processing Facilities must adhere to these procedures for testing of their crops or livestock products.

A. Genetics-based testing is required for VISPS Smart Farm products in the NGO class only.

B. The frequency and location of Real Time or Digital PCR testing can be tailored to accommodate the applicant's supply chain.

C. Product samples must be submitted for testing to the following VISPS Smart Farm approved laboratory:

i. AgMaxx Laboratories, 28706 S. State Route 7, Garden City, MO 64747

D. Only test results from the VISPS Smart Farm approved laboratory will be accepted by the VISPS Administrator. Test results from other laboratories will be accepted with prior approval by the VISPS Administrator.

E. The test results must be sent to the VISPS Administrator to be retained in the client files in the VISPS online software.

Testing of Blended Stored Crops

Each lot number of plant-based crops shipped from a blended storage grain bin or other storage container must be tested for the presence or absence of GMOs at or below the tolerance level for the crops final usage before shipping.

A. VISPS producers should retain small samples as they are storing grain from fields in storage bins in a clean sanitized bucket as they are filling the bin. This will cause a composited sample for the lot. Each lot in a bin needs a composited sample.

i. If VISPS producers do not take a composited sample in this manner, they may use the following approach: Open the grain bin trap and allow the grain to flow freely into a clean sanitized bucket for at least 6 catches and composited into one sample.

B. The composited sample should be divided into three samples. One of the three samples should be sent to the VISPS Administrator to be retained for 12 months from the time of sampling; one of the three samples should be retained by the VISPS producer; and the third sample should be sent to the VISPS Smart Farm approved laboratory for GMO testing.

i. A GMO test submittal form, found inside of the VISPS online software, must accompany the samples sent to the Administrator and approved laboratory. This should form accompany the sample stored by the producer.

Complaints or Calls of Concern

If there is a Complaint or Call of Concern about an applicant's compliance with VISPS Smart Farm Standards, such as using GMO seeds, prohibited seed treatments, Prohibited Substances, or farming methodology of the applicant, an investigation will be scheduled with the Production Operation or Processing Facility at their earliest convenience.

A VISPS inspection for complaints or calls of concern may consist of

A. On-farm or facility audit of books will be conducted, including, but not limited to: a review of seed input tags, seed and input invoices, clean equipment records, harvest records, and shipping / sales records.

B. If needed, the inspection may escalate to:

i. Visually inspecting the crop fields for evidence of prohibited applications or substance use in fields

ii. Randomly sampling of crops in the fields; or if already harvested, stored grains may be sampled.

iii. Any other items as deemed necessary by the VISPS Inspector to verify compliance with the VISPS Smart Farm Standards.

5. Non-GMO (NGO) Standards for the VISPS Smart Farm Verification Program

NGO verification is a document review and lab testing program only.

All NGO applicants must obtain a composite sampling of their grain to be sent to the VISPS approved laboratory for verification of the Non-GMO status before shipping their grains.

Besides the minimum standards identified in **Section 4**, NGO applicants must comply with the individual standards in this **Section 5**.

Seeds

A. Only non-GMO seeds may be used to produce NGO final products

B. All other seed treatments are allowed in NGO final products

Prohibited Substances Under the NGO Standards

A. All GMO seeds are prohibited.

6. Class 2: HC Free (HCF) Standards for VISPS Smart Farm Verification Program

Besides the minimum standards identified in **Section 4**, HCF applicants must comply with the individual standards in this **Section 6**.

Seeds

A. Only non-GMO seeds may be used to produce HCF final products.

B. Non-GMO seeds and approved seed treatments must be verified by copies of the seed tags, and/or a statement must be supplied from the seed supplier stating that the seeds and/or seed treatments have been produced using Non-GMO methods.

C. Invoices must be submitted that corroborates that the seeds as portrayed by the seed tags have been purchased in sufficient amounts to plant total acres in the fields.

Prohibited Substances Under the HCF Standards

A. GMO seeds

B. Seed treatments produced using GMO methods are prohibited

C. Soil fertility, pests, weeds and disease treatment substances may not be used for the HCF Standards, crops; excepting as listed in the most current VISPS HCF Allowed Substances and Production Methodologies listing. Any other substances that the applicant might want to use must be prior approved by the VISPS Administrator.

7. Transitional-to-Organic (TTO) Standards for the VISPS Smart Farm Verification Program

Besides the minimum standards identified in **Section 4**, TTO applicants must comply with the individual standards in this **Section 7**, and the National Organic Program regulations, 7 C.F.R. §§ 205.1 through 205.690. A complete updated copy of the NOP standards may be found at: www.ams.usda.gov/about-ams/programs-offices/national-organic-program.

Land Requirements

A. Land may be certified organic 36 months from the last date of application of Prohibited Substances.

B. Farms may be verified as Split or Parallel Operations, with some Fields completing the TTO period before other Fields on the same farm.

C. Land to be verified as TTO must obtain a Prior Land Use Affidavit or other documents that verifies the last date of applications with Prohibited Substances. This date will start the transitional period.

D. Crop rotations must be established, sufficient to: (a) Maintain or improve soil organic matter content; (b) Provide for pest management in annual and perennial crops; (c) Manage deficient or excess plant nutrients; and (d) Provide erosion control. Cover crops may include, but are not limited to Sod, Green Manure Crops, Catch Crops, Cash Cover Crops.

Seeds

A. Only Non-GMO, non-chemically treated seeds may be used to produce TTO final products.

B. No synthetic chemical plant disease, fungicides, or pesticide seed treatments may be used to produce TTO final products.

C. Non-synthetic seed treatments may be used on seeds to produce TTO final products such as, but not limited to: natural microbial and/or biological products and bulking agents; i.e., bentonite clay added to add size to the seed for precision planting. Seed treatments must be verified by the VISPS Administrator as being produced without GMO methods before being applied to the seeds.

D. Non-GMO, and non-treated seeds must be verified by copies of the seed tags, and/or a statement must be supplied from the seed supplier stating that the seeds and/or seed treatments have been produced using without GMO methods.

E. Invoices must be submitted that collaborates that the seeds as portrayed by the seed tags have been purchased in sufficient amounts to plant total acres in the fields.

Prohibited Substances Under the VISPS TTO Standards

A. All substances prohibited in the USDA-NOP standards, 7 C.F.R §205.602 are prohibited.

B. Any synthetic substances not listed in the USDA-NOP standards, 7 C.F.R. §205.601. for organic crop production are prohibited.

VISPS Smart Farm Verification Program– Livestock Program and Standards

Introduction to the VISPS Smart Farm Livestock Verification Program

The VISPS Smart Farm Livestock Verification Program applies the principles and goals of the VISPS Smart Farm Verification Program to livestock production. As with the VISPS Smart Farm Standards for crops and Minimally Processed Agricultural Products, the Livestock Program provides a verification system for livestock raised by natural, sustainable, humane, and healthful practices. Completion of the VISPS Smart Farm Livestock Verification Program entitles producers to promote and communicate those attributes to the marketplace. Thus, livestock products in the program will receive a license to use the VISPS Smart Farm Mark on their marketing materials. Consumers, chefs, restaurateurs, and others in the chain will benefit from the VISPS Smart Farm Verification Program's sound, reliable certification of livestock.

The VISPS Smart Farm Livestock Verification Program builds on, and complements, the VISPS Smart Farm Standards for crops and Minimally Processed Agricultural Products. Livestock producers participating in the VISPS Smart Farm Verification Program with crops or pastures can use that certification to build a VISPS Smart Farm Livestock Verification Program. Thus, a producer can increase the benefits of VISPS Smart Farm verification by including their livestock within the VISPS Smart Farm system.

The VISPS Smart Farm Livestock Verification Program was also designed to facilitate compliance with regulatory criteria for labeling. Thus, VISPS can provide applicants with procedures, records, and data needed to support labeling under the Federal Meat Inspection Act and the Poultry Products Inspection Act.

The VISPS Smart Farm Livestock Verification Program can also stand alone, i.e., enrollment in VISPS Smart Farm for Crops/Minimally Processed Agricultural Products is not a prerequisite. A livestock producer may begin from scratch and apply for certification of pastures, feedstuffs, and livestock under the VISPS Smart Farm Livestock Verification Program.

The VISPS Smart Farm Livestock Verification Program certifies compliance in two methods of production:

- **Non-GMO Livestock (NGO)** – Livestock raised on non-GMO feedstuffs from weaning until slaughter, without health care products derived from genetically engineered methods.

- **Natural Livestock (NAT)** – Livestock that are pasture-grown and raised on grass, forage, vegetarian feedstuffs, non-GMO grain, and unmedicated minerals, raised without hormones, antibiotics, ionophores, and beta-antagonists.

Each method is certified according to the VISPS Smart Farm Livestock Standards, and also standards unique to each method, which can be differentiated in labeling and marketing.

8. VISPS Smart Farm Livestock Standards

The VISPS Smart Farm Livestock Standards are as follows:

VISPS Livestock System Plan

A. All Applicants must prepare and submit a written management plan (VISPS System Livestock Plan [VSLP]) for all agricultural production activities as defined herein, including the VISPS Livestock standards and return them to the VISPS Administrator before being considered for the VISPS Initial Review.

B. The plan must include the following documentation: purchase invoices/receipts, birthing records, origin records, feed invoices/receipts, records of feed ingredients, medication invoices/receipts, health inputs, and any other documentation required by the Administrator.

C. The plan must also include a map of the farm and / or facilities where the livestock are raised and handled.

Maps and Flow Charts

A. A farm map must be submitted to show the specific details of the fields, pastures, and facilities being used for production. The map should include field numbers and acres. Livestock facilities must be identified on the farm maps. Suitable maps may be obtained from your local USDA office (e.g., Farm Service Agency, Natural Resources Conservation Service, etc), or a mapping service able to verify field acreages.

B. Separate facility maps where livestock are raised and handled must be submitted. The maps should include size (e.g., square feet, etc.), location on the farm, feed storage, feeding areas, loafing areas, watering systems, and other applicable areas designated by the Administrator (e.g., milking barns).

C. A flow chart must be submitted that traces the flow of the livestock from birth/purchase through the final on-farm production stage (e.g., delivery to slaughter, egg processing facility).

D. Maps and flow charts may either be attached to your VISPS on-line application; or mailed to the VISPS Administrator; or may be scanned and emailed to maps@vispsverified.com.

Clean-Out Procedures

A. The VISPS Livestock System Plan must include Clean-Out Procedures adequate to prevent Contamination and/or Commingling of livestock, pastures, feeds, medications, and health supplements with substances prohibited by the VISPS Smart Farm Standards. The procedures must be developed and documented for all direct-contact livestock equipment. Equipment includes, but is not limited to: feed bunks, feed delivery trucks, gravity wagons, auger systems, feed bins, and other equipment used by the livestock operation.

B. All Clean-Out Procedures must be submitted to the Administrator for approval before they are implemented.

C. Records must be maintained verifying that the Clean-Out Procedures have been carried out.

D. If a necessary Clean-Out Procedure is not carried out, a back-up Clean-Out Procedure may be performed to comply with the VISPS Smart Farm Standards. The back-up Clean-Out Procedure and results must be recorded.

Traceability

A. The VISPS System Plan must include a livestock tracking system adequate to trace the livestock from birth/purchase through the final on-farm production stage (e.g., delivery to slaughter, egg processing facility, transfer by sale, etc.).

B. The tracking system should include unique identifiers that facilitate lot numbering for discreet lots of livestock as well as individual animals. The system must also facilitate identification of individual animals to its dam. Acceptable methods may include ear tags, or tattoos. Tracking systems for poultry may by implemented on a flock-by-flock basis as directed by the Administrator.

VISPS Inspections

A. When applicable, an on-site Inspection will be performed by a VISPS Inspector. The Inspection must be completed while the livestock are on-site. The VISPS Inspector will schedule the Inspection with the Applicant's designated representative to occur during normal business hours. The frequency of Inspections depends on the methods being certified (NGO, NAT). Some methods do not require annual Inspections.

Testing for VISPS Livestock and Livestock Products

A. When applicable, testing will be performed on pastures, feeds, medications, and health supplements by a VISPS Inspector or an approved laboratory. Testing must be completed while the livestock are on-site. Items requiring testing depend on the methods being certified (NGO, NAT). Some methods do not require testing.

B. High-risk feedstuffs must be certified GMO-free within the VISPS tolerances before feeding to NGO livestock. Testing may be required for such feedstuffs, including pastures, hay, hay additives, forages, or feed additives and supplements.

C. All Feedstuffs for NGO livestock must be proven GMO free. Feedstuffs produced on-farm that incorporate High Risk Crops will be verified as GMO-free by test-strips. Purchased feedstuffs may be verified by the supplier's signed affidavit attesting that the feedstuffs are GMO-free within the VISPS tolerances or with Non-GMO labels attached.

D. Livestock and final livestock products will not be directly tested for GMO's.

Compliance Inquiries / Complaints

A. The VISPS Administrator will investigate all inquiries and complaints received about a product or Applicant's compliance with the VISPS Smart Farm Livestock Verification Program. The Applicant will be notified of the inquiry/complaint and the subject matter. When necessary to resolve an inquiry/complaint, the VISPS Administrator will complete inspections, audits, reviews, and hearings among the parties involved.

B. An Applicant must cooperate with the VISPS Administrator and provide all information needed to resolve the inquiry/complaint.

C. Applicants may be requested to permit on-site audits of books and records required to verify compliance with the relevant standards (e.g., purchase receipts, clean equipment records, production or processing records, and shipping/sales records, etc.). Testing of product samples may be required in some instances.

Base Dietary Requirements

A. Beef, Swine, Dairy - Offspring from bred stock. Bred stock must maintain a compliant diet from the third trimester of pregnancy through weaning of offspring. Bred stock may otherwise consume a non-compliant diet, but must be maintained on a compliant diet from the beginning of the third trimester of pregnancy. Offspring must maintain a compliant diet from birth through delivery to slaughter. Pastures, feeds, medications, and health supplements must comply with the VISPS Smart Farm Standards.

B. Poultry must maintain a compliant diet from the second day of life. Pastures, feeds, medications, and health supplements must comply with the VISPS Smart Farm Standards.

C. Records must be maintained for all pastures, feeds, medications, and health supplements consumed/grazed by livestock. Required records include labels/bag tags for feeds, medications and health supplements, purchase invoices/receipts. These records must be submitted to the VISPS Administrator and copies must be maintained in the Applicant's records.

D. Applicant must be able to demonstrate that nutritional requirements of all livestock have been met with adequate pastures, hay, forage, and/or feedstuffs. Pasture acreage

must have sufficient carrying capacity for the number of animals. Feed purchases should be adequate to meet nutritional needs for the number of animals.

E. Applicant must take reasonable precautions to prevent drift of pollen from GMOs onto pastures or crops intended to be fed to NGO livestock.

Medical and Health Care

A. All health inputs, including homeopathic products, biologicals, and vaccines must be verified as Non-GMO by a signed statement from the manufacturer before administering them to the VISPS verified livestock

B. Breeder animals, before last 3rd trimester of the pregnancy, may be given any health care products, including antibiotics, vaccinations, and parasiticides regardless of its GMO status. At the beginning of the last 3rd gestational period and during lactation period, the breeder livestock must be maintained as VISPS compliant animals.

C. Records must be maintained documenting the health care inputs, purchase receipts, and date and rate of the application for all health inputs given to the VISPS verified livestock.

9. Non-GMO Livestock (NGO) – Specific Protocols

A. Livestock must be raised with only non-GMO feedstuffs, and treated only with non-GMO medications and health care products, from birth until slaughter.

B. Beef, Swine, Dairy - Offspring from bred stock. Bred stock must maintain a diet comprised only of Non-GMO feedstuffs from the third trimester of pregnancy through weaning of offspring. Offspring must maintain a diet comprised only of Non-GMO feedstuffs from birth through delivery to slaughter. Pastures, feeds, medications, and health supplements must comply with the VISPS Smart Farm Standards.

C. Poultry must maintain a diet comprised only of non-GMO feedstuffs from the second day of life until slaughter or natural death.

D. Non-GMO vitamins and mineral supplements may be provided.

E. GMO-derived feedstuffs, vitamins, and mineral supplements are prohibited in the livestock's diet.

F. Livestock may be treated for sickness, injury, or to maintain the health of the animals, only with Non-GMO-derived medications and health care products. Medications and health care products include, but are not limited to, biologicals, vaccines, and homeopathic products.

G. All medications and health care products must be approved by the VISPS Administrator before administering to the livestock to prevent accidental applications of prohibited substances.

H. All livestock feeds, feed supplements, vitamin/mineral tubs or any other feedstuffs must be documented as sourced from Non-GMO and VISPS verified suppliers.

I. Livestock that consume prohibited feedstuffs, or are administered prohibited medications or health care products, must be permanently identified and tracked to ensure that it does not receive VISPS verification. Health records shall document the administration of the medication or products and made available to the VISPS Administrator or VISPS Inspector upon request. NGO applicants will not be subject to regularly scheduled on-site inspections of operations. If necessary to resolve a Compliance Inquiry/Complaint, or to confirm production methodology on the operation, an on-site inspection will be scheduled by the VISPS Inspector.

10. Natural (NAT) – Specific Protocols

A. Livestock must be raised primarily on a forage-based diet which maximizes access to and use of pasture.

B. The livestock must be raised on a diet of grass (from the plant family Poaceae) and / or forage (vegetative materials capable of being fed to livestock) for the majority of their live after weaning. “Majority” means at least 75% of the lifetime of the animal from weaning until slaughter.

C. Livestock must have full, year-round access to pasture after weaning until slaughter. Confinement is allowed for necessary handling activities such as calving, sorting, weaning, treating illness, transportation, or similar activities. Any confinement must be as short in duration as is reasonably possible for the purpose of the confinement.

D. Livestock must not be fed or treated with hormones, antibiotics, ionophores, and beta-antogonists.

E. Livestock must be treated for sickness, injury, or to maintain the health of the animals. Medications and health care products include, but are not limited to, biologicals, vaccines, and homeopathic products.

APPENDIX 1 – Tolerances

The VISPS Smart Farm Verification Program has adopted tolerances for the presence of GMOs. These tolerances have been adopted to qualify the VISPS Smart Farm products for eligibility with other commercially available certification systems for final food products (for example the Non-GMO Project)

Category	Action Threshold
Seed and other propagation materials.	0.25%
Human Food-Grade NGO & HCF crops intended to be used for human foods.	0.9%
Feed-Grade HCF crops intended for livestock feeds.	2.5%
Feed-Grade NGO crops intended to be used for livestock feeds.	3.5%
Feed-grade crops intended to be fed to NGO and NAT livestock	3.5%

APPENDIX 2 –Allowed Substances and Crop Production Methodologies

NGO

A. All soil fertility amendments, pest and weed substances are allowed under the NGO standards, unless specifically prohibited.

B. All crop cultural practices are allowed under the NGO Standards unless specifically prohibited.

HCF

HCF producers may use any soil fertility amendments, pest, and weed substances deemed to be harmless to the environment by the VISPS Standards Committee or the VISPS Administrator. Current allowed products are as follows.

A. All OMRI materials and products listed for organic crops and livestock production are allowed. www.omri.org

B. All Washington State Department of Agriculture materials and products listed as allowed for organic crop and livestock production are allowed. https://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.aspx

C. All California Department of Food and Agriculture materials and products listed as allowed for organic crop and livestock production are allowed. www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html

D. All EPA material and products listed as allowed for organic production are allowed. www.epa.gov/pesticide-registration/epas-national-organic-program-guidance

E. All Ohio Ecological Food and Farm Association certification clients may also use the materials and products listed as allowed for organic production. www.oeffa.org/oeffa.php

F. All seeds in the USDA National Organic Program, 7 C.F.R. §205.204, are allowed.

G. All soil fertility amendments in the USDA National Organic Program, 7 C.F.R. §205.203.

H. All soil fertility, pest, weeds, or disease substances in the USDA National Organic Program, 7 C.F.R. §205.601.

I. All crop pest, weed, and disease management practices and materials in USDA National Organic Program for soil fertility, pest, weeds, and diseases found in 7 C.F.R. §205.206.

J. All soil fertility, pests, weeds, and disease input materials determined to be compliant by the VISPS Standards Committee or the VISPS Administrator and that have been published on the VISPS Smart Farm website as approved. https://vispsverified.com/approved-products.php

TTO

A. All OMRI materials and products listed for organic crops and livestock production are allowed. www.omri.org

B. All Washington State Department of Agriculture materials and products listed as allowed for organic crop and livestock production are allowed. https://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.aspx

C. All California Department of Food and Agriculture materials and products listed as allowed for organic crop and livestock production are allowed. www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html

D. All EPA material and products listed as allowed for organic production are allowed. www.epa.gov/pesticide-registration/epas-national-organic-program-guidance

E. All Ohio Ecological Food and Farm Association certification clients may also use the materials and products listed as allowed for organic production. www.oeffa.org/oeffa.php

F. All seeds in the USDA National Organic Program, 7 C.F.R. §205.204, are allowed.

G. All soil fertility amendments in the USDA National Organic Program, 7 C.F.R. §205.203.

H. All soil fertility, pest, weeds, or disease substances in the USDA National Organic Program, 7 C.F.R. §205.601.

I. All crop pest, weed, and disease management practices and materials in USDA National Organic Program for soil fertility, pest, weeds, and diseases found in 7 C.F.R. §205.206.

APPENDIX 3 - Approved Products for the VISPS Smart Farm Livestock Standards

NGO Livestock

A. All feed, feedstuffs, or health care products may be used for production and processing of VISPS NGO verified livestock and livestock products;

B. No the feeds, feedstuffs, and health care products must not be derived by GMO methods.

NAT livestock

A. All OMRI materials and products listed for livestock production are allowed for the VISPS CTO standard. http://www.omri.org.

B. All Washington State Department of Agriculture materials and products listed as allowed for organic livestock production are allowed. https://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.aspx

C. All California Department of Food and Agriculture materials and products listed as allowed for organic livestock production are allowed. www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html

D. All EPA material and products listed as allowed for organic production are allowed. www.epa.gov/pesticide-registration/epas-national-organic-program-guidance

E. All feed, feedstuffs, or health care products determined to be compliant by the VISPS Standards Committee or the VISPS Administrator and that have been published on the VISPS Smart Farm website as approved. https://vispsverified.com/approved-products.php

APPENDIX 4 - VISPS Smart Farm Mark