



## **The U.S. Identity Preserved Assurance Plan**

**Identity Preserved (IP)**— A U.S. Identity Preserved grain or oilseed is grown in the United States and has specific desirable traits maintained through each step of production and transportation to the end-user using a specific, written, verifiable plan. IP grains and oilseeds are segregated and can be defined by variety, characteristic, type, modification, region of origin or growing practice.

### **1. Program Audit**

The Verified Mark User (VMU) maintains a third-party audit, in part or in whole of its Identity Preserved Program, reviewable by a proper authority and available for review. The company has a written identity preserved plan and follows it.

- 1.1. The audit agency shall require inspections and/or audits necessary to verify that the production system is meeting stated product quality objectives.
- 1.2. The audit agency shall establish and document processes for performing audits and inspections including:
  - 1.2.1. Evaluation points in the system.
  - 1.2.2. Identity and qualifications of evaluators.
  - 1.2.3. Inspection/audit methods to be used.
  - 1.2.4. Rules for the selection of samples for testing and evaluation.
  - 1.2.5. Reporting methods and records generated.
- 1.3. For evaluation activities not performed by the agency, the agency shall establish and document the process used to evaluate, approve, and validate the performance of evaluators and the accuracy of evaluation results.
- 1.4. Annual System Review
  - 1.4.1. The agency shall annually review IP programs to validate the effectiveness of the system in achieving the quality objectives.
  - 1.4.2. Corrective actions shall be required for identified non-conformances.
  - 1.4.3. Program modifications shall be submitted to SSGA for approval.
- 1.5. Certain third-party audits that are currently in place for the VMU substantively qualify and satisfy as a proper authority. Approved Audit Agencies include:
  - 1.5.1. IP Management plan of AOSCA
  - 1.5.2. USDA National Organic Program audit
  - 1.5.3. GFSI and affiliated company's annual audit (i.e., BRCGS, SQF, etc.)
  - 1.5.4. AIB International certification and audit

- 1.5.5. FSSC22000 certification and audit
- 1.5.6. NSF Certification and audit
- 1.6. The VMU is fulfilling the written IP plan as promised and described in their procedures that have been approved to meet the standards as outlined in the IP program.

## **2. Grower Activities**

The Verified Mark User verifies products are traceable back to a defined point in the supply chain. Grower activities have been followed and meet the requirements of the company's written IP program. These may include, but are not limited to: care of equipment, records, storage, maintaining identity of product, land selection, planting, growing, harvesting, handling, and/or transportation.

### **2.1 Care of equipment**

- 2.1.1. VMU, growers, and handlers of IP products are responsible for determining that all equipment used for planting, harvesting, conveying, storing, handling, and conditioning is thoroughly cleaned before handling IP products.

2.2. Grower Records. The following records must be maintained and in accordance with the VMU's IP plan and program:

- 2.2.1. Seed origin and/or receipts

- 2.2.2. Amount of product harvested (estimated) for example through combine monitors, scale tickets during harvest delivery, load tracking during on-farm storage

- 2.2.3. Assigned bin number and bin measurements confirming quantity of IP production

- 2.2.4. Assigned lot number

- 2.2.5. Record of any seed transfers

### **2.3. Storage**

- 2.3.1. Bins or storage units should be cleaned and inspected.

- 2.3.2. Maintain segregation and preservation through careful documentation and recording of where IP product is stored.

### **2.4. Maintaining identity of products**

- 2.4.1. Each field must be identified with a number.

- 2.4.2. FSA maps showing field identities and locations must be maintained.

- 2.4.3. A bin or lot number must identify all bins or storage units.

### **2.5. Land selection**

- 2.5.1. There should be enough separation distance to avoid mechanical mixtures by harvesting equipment during harvest.

- 2.5.2. On cross-pollinating crops the distance required to minimize pollen contamination needs to be planned for field layout, or a plan in place to harvest off a buffer strip that will not be used as IP production.

### **2.6. Planting**

- 2.6.1. Grower should inspect and clean the planter.

- 2.6.2. Seed variety should be recorded by field / parcel.

### **2.7. Growing**

- 2.7.1. Grower inspections and/or third-party inspections should note any concerns and volunteer crops that may result in contamination of IP product.

2.7.2. The IP product should be noted to be characteristically uniform given the growth stage and crop maturity.

2.8. Harvesting

2.8.1. Periodic samples throughout harvest should be taken by the grower to provide a composite sample of IP product being stored on-farm.

2.8.2. Harvested amounts shall be recorded.

**3. Field Inspection – Planting**

The Verified Mark User certifies that all field verification processes agreed with the buyer have been followed and are traceable back to a defined point in the supply chain. Field inspections include verifiable documents and procedures.

3.1. Land Requirements

3.1.1. The land where the crop is grown must be within the United States or its territories.

3.1.2. Crop must be produced and harvested on land allowing for segregation and integrity of IP production. Procedures should be established that will not allow mixtures of other non-characteristic varieties and crops into the IP production.

3.2. Requirement for field tracing must include the following:

3.2.1. Program name: i.e., IP Soybean Seed

3.2.2. Grower's address and phone number

3.2.3. Name of variety/brand/characteristic to be certified

3.2.4. Planting date

3.2.5. Field size (acres)

3.2.6. Field location

**4. Source of Seed**

The Verified Mark User verifies seed sources, which may originate from a variety of approved means. Seed records and proof of origin must be maintained and be verifiable through program audit or inspection. Seed origin conveys an identifiable output of crop consistent with the contracted characteristic and/or varieties made in the identity preserved sales contract.

4.1. Seed Selection

4.1.1. Proper selection of seed influences the entire IP process. Future compositional qualities are determined with this step. Seed selection may be the grower's choice or may be designated by the VMU or the VMU's customer.

4.1.2. Tolerance for varietal mixture, or absence or presence of a specific trait is critical for the seed selection. This should be in accordance with the VMU's process or contractual obligations.

4.2. Seed lot traceability

4.2.1. Retained planting seed purchase invoices and seed tags for each lot of seed purchased to produce the quantity of the IP product contracted or delivered is highly recommended

4.2.2. The VMU should have sufficient documentation to prove that the seed purity and/or characteristics identified has been maintained.

4.2.3. "Bin run" seed is highly recommended to not be used.

4.2.4. Minimally, the VMU must have a form of documentation used to trace the seed lots from the grower and extended through their process to allow the finished product to be traceable.

## **5. Field Verification – Growing and Harvesting**

The Verified Mark User has had one or more field inspections during the growing and harvesting season to verify customer characteristic or varietal identity requirements consistent with its contract. This VMU verifies that field inspection standards required by the customer have been met. Field inspections include verifiable documents and procedures.

### **5.1 Field Inspection**

5.1.1. Inspectors can be third party, the VMU representative, or a grower that is trained on expectations set by the VMU.

5.1.2. VMU and grower should agree on tolerances or limits in the growing plan.

5.1.3. Inspectors should inspect the field during the growing season to confirm that buffer strips and/or isolation distances have been met.

5.1.4. Growers should report whether growing plan tolerances are met and whether volunteer crops, insects, and other pests, affect tolerances.

5.1.5. Inspectors should look for off-types from contamination, planting errors, impure planting seed, or other issues causing concerns for identity preservation.

## **6. Segregation Activities**

The Verified Mark User ensures the identity of the product, including crop year, and that the product identity is managed during handling and transportation. The product is segregated from other products, and risk of additional foreign materials throughout the handling process is greatly minimized to below contracted levels. From field to storage to processing, further to packaging and transportation to the buyer, product is maintained under controlled conditions in such a way that the end user is assured that product retains its unique identity.

### **6.1. Grower equipment and activities**

6.1.2. Planting equipment, including but not limited to: planters, drills, seed tenders, conveyance equipment, etc., must be vacuumed, blown, and cleaned out before containing IP planting seed to eliminate contamination at planting.

6.1.2 Handling equipment used at harvest must be thoroughly flushed and cleaned out before harvesting IP product. If necessary, the IP product should be harvested in sections related to quality. IP product should be used to flush the grain handling system and sold off as separate non-IP product.

### **6.2. On-farm storage**

6.2.1. Records should be maintained as to previous storage in the bin intended for IP product storage.

6.2.2. Prior to filling, the bin must be cleaned and inspected by the grower to eliminate contamination.

6.2.3. Bins containing IP product must be clearly identified in grower's tracking system and available to all individuals in the farming operation.

6.2.4. Prior to unloading, equipment must be thoroughly cleaned or flushed, and inspected to eliminate contamination of the IP product.

### 6.3. Transportation

6.3.1. Clean and inspect truck and loading equipment.

6.3.2. Document and/or sign affirmation required by VMU indicating appropriate care was provided during the planting, growing, harvesting, handling, and transportation of the IP product (i.e.: grower contract, clean truck affidavit, etc.)

## 7. Chain of Custody

The Verified Mark User certifies chain of custody from production field to final delivery with the end user. This can be proven through verifiable record keeping and documentation available for audit review. Sampling and analysis are required at different stages to ensure the customer and seller agree on identification of the crop.

### 7.1. VMU equipment and activities

7.1.1. Receiving – Confirm variety or identifiable characteristic, inspect quality, and document lot numbers. Segregate storage and document accordingly.

7.1.2. Handling – Clean and inspect all handling, conveying, conditioning, and packaging equipment. Maintain segregation throughout, documenting quality, storage location, and final quantity. Record all conditioning activities.

7.1.3. Transport – Clean and inspect truck or shipping container. Repair equipment or line the transportation container to prevent contamination and to maintain product quality and integrity.

### 7.2. Record keeping and documentation

7.2.1. VMU records – Keep accurate quantity and quality records for each inbound source. Document all conveyance and movement of the IP product throughout handling and conditioning. Label bags, totes, or storage accordingly.

7.2.2. VMU Controlled Transportation – Record all movement, documenting all identification numbers of vehicles transporting the IP product.

### 7.3. Sampling and analysis are required at different stages to ensure the quality and identification.

7.3.1. Sample each inbound load and perform specified tests according to VMU's established procedure.

7.3.2. Inspect grain/oilseed and document findings per the VMU's established protocol during storage, conditioning, or conveyance.

7.3.3. Save and label a sample from each inbound grower load and finished lot, according to the VMU's established protocols.

## 8. Labeling – Product Identification

The Verified Mark User maintains all records and documents to assure the product is identifiable and clearly marked at all times – in processing, receipt, transport, and delivery. The VMU may then affix the U.S. Identity Preserved mark as set forth by the standards of use.

8.1 Records may include, but not limited to:

- 8.1.1. Inbound load quantity and quality.
- 8.1.2. Detailed storage history maintained and tracked.
- 8.1.3. Record commingling of any lots.
- 8.1.4. Inspection reports for handling and processing equipment confirming the cleaning, flushing, and inspecting prior to conditioning IP product.
- 8.1.5. Finished goods quality and quantity recording, including lot numbers and date of manufacturing.
- 8.1.6. Inspection reports of trucks or containers prior to loading.
- 8.1.7. Tracking the movement using vehicle identification on trucks, containers, rail, vessel, and other modes of transportation.

It is the responsibility of each VMU participant to establish standards, follow the standards and rules, and report irregularities or violations. Intentional violation of the standards or misuse of the U.S. Identity Preserved Assurance Plan and/or U.S. Identity Preserved Assurance Plan Mark can result in suspension or disqualification.