Certification Requirements for Non-GMO Project Approved Laboratories

A. Technical Requirements

1. ISO Accreditation

All Non-GMO Project Approved Laboratories must be ISO 17025 Accredited.
Laboratory must submit copies of the following to the Non-GMO Project (NGP):

- ISO 17025 Certificate of Accreditation
- ISO 17025 Scope of Accreditation

Both documents must clearly indicate a date of renewal or expiration, or in the alternative, laboratory must provide official documentation from the accrediting body specifying renewal or expiration. Laboratory is responsible for ensuring that documents on file with NGP are current at all times.

2. GM Event Testing

The enclosed Testing Capacity and Accreditation forms, for qualitative and quantitative testing, respectively, specify the GM events for which each High-Risk Crop/Input must be tested. In the space provided on each table, please complete the following information:

- Indicate which events the laboratory can test for and specify the PCR test(s) used to detect each event. (Use the specific test name as it is displayed on the analysis report issued to customers).
- Indicate whether or not the laboratory is ISO 17025 accredited for each test.
- Please note that a laboratory will be approved for testing a given crop only if the laboratory (a) is able to provide in-house testing for all the events listed in the table for said crop and (b) is accredited for all such tests.
- Laboratories can be approved exclusively for Qualitative testing, Quantitative testing, or both, depending on their offering of tests and accreditation and pursuant to the restrictions below:
    - For commodity crops (such as canola, corn, soybeans), both Qualitative and Quantitative testing capabilities are required.
    - For other crops (alfalfa, cotton, papaya, sugar beets and zucchini/summer squash), laboratories can be approved exclusively for Qualitative testing, Quantitative testing, or both.
    - No laboratory will be approved if they can only offer qualitative testing across all crops.

Please complete both tables

3. Analytical Reports

Laboratory must provide anonymized exemplar reports as specified below in subsections (i) – (iv) from actual samples the lab has analyzed. Simulated reports will not be accepted. Analyses must be for samples derived from High-Risk crops as defined in the Non-GMO Project Standard Appendix B. High-Risk List, A. Testable High-Risk Inputs.

i. PCR Analysis report - for Quantitative PCR Analysis:
   a. Analysis of a sample containing a High-Risk species; and for which appropriate laboratory controls indicate that the DNA of the High-Risk species is sufficiently intact to allow valid quantitative analysis by PCR.
   b. Example sample materials include: whole grain, flours and meals.
   c. The report must show a positive Quantitative test result.

ii. PCR Analysis report - for Quantitative PCR Analysis:
   a. Analysis of a sample containing a High-Risk species; and for which appropriate laboratory controls indicate that the DNA of the High-Risk species is not sufficiently intact to allow valid quantitative analysis by PCR.
   b. Examples of source material include oil, sugar, starch or lecithin.

iii. PCR Analysis report - for Qualitative PCR Analysis:
   a. Analysis of a sample containing a High-Risk species; and for which appropriate laboratory controls indicate that the DNA of the High-Risk species is sufficiently intact to allow valid quantitative analysis by PCR.
   b. Example sample material include: whole grains, flour and meals.
   c. The report must show a positive Qualitative test result.

iv. PCR Analysis report - for Qualitative PCR Analysis:
   a. Analysis of a sample containing a High-Risk species; and for which appropriate laboratory controls indicate that the DNA of the High-Risk species is not sufficiently intact to allow valid quantitative analysis by PCR.
   b. Examples of source material include oil, sugar, starch or lecithin.

4. Proficiency Testing

Laboratory must provide a copy of results from its participation in proficiency testing, which must be performed by a proficiency-testing provider acceptable to the Project, and conducted within the preceding two years. The proficiency testing must be conducted on one or more of the High-Risk crops as defined by the Project, and for GM events found in those crops. These results must be sufficiently extensive to establish laboratory's proficiency in GMO testing and must include a significant number of quantitative results. The complete report from the proficiency testing provider is required, as well as a letter indicating the laboratory's participant number. No internal summary or report will be accepted.

B. Administrative Requirements

1. The Non-GMO Project Approved Laboratory Agreement (the "Lab Agreement") must be dated and signed by an authorized signatory of the laboratory.

2. The Non-GMO Project Approved Laboratory Questionnaire must be completed and signed.

C. Ineligibility Factors

1. **Any Laboratory "affiliated with" any Participant (defined below) in the Product Verification Program ("PVP") is ineligible to, and therefore may not, become a NGP Approved Laboratory.**

    - **A Laboratory is "affiliated with" a Participant if the Laboratory owns or controls, is owned or controlled by, or is under common ownership or control with a Participant.**

    - **A "Participant" is any entity, including without limitation, any company, corporation, LLC, partnership, joint venture, or other person or organization, or any brand that (a) has products enrolled; and/or (b) sells or distributes, and/or uses its private-brand label in connection with, any Non-GMO Project Verified Product that has been manufactured, supplied, co-packed, labeled, or otherwise provided by a third-party Participant.**

2. **A Laboratory that owns or administers a competing GMO avoidance scheme as a certifying body for retail products may not become an NGP Approved Laboratory.**

D. Maintenance of and Returning to Compliance

1. Maintaining Compliance. In order to maintain approved status, all Non-GMO Project Approved Laboratories must remain in compliance with the Certification Requirements at all times. Further, each year, the laboratory must renew its certification, demonstrating full compliance with the Certification Requirements, including any amendments thereto, and must submit certain documentation as follows: A) every other year beginning on the date that is one year after the date of initial Certification, lab must submit a completed, dated and signed "Summary of Compliance" form, which will be provided to the laboratory by the Project; and B, every other year beginning on the date that is two years after the date of initial Certification, complete renewal documentation. Such renewal must be completed by July 1 each year. The Certification Requirements may be revised annually, in the Project's sole discretion. When such requirements change, Non-GMO Project Approved Laboratories will be notified by email six (6) months before the renewal documents are due to provide sufficient time for compliance at renewal. In the event a laboratory is found to be out of compliance with the Certification Requirements, whether during a renewal certification or at any other time (which may occur, without limitation, due to quality assurance processes or the Project's investigation of third-party complaints), the procedure for returning to compliance, described in Section 2 below, is triggered. If laboratory is unable to correct the non-compliance within a commercially reasonable cure period as determined by the Non-GMO Project, it will be deemed a "Defective Laboratory" and/or a "Terminated Laboratory," as defined in the Lab Agreement.

2. Curing and Correction of Non-Compliance. At any time, including at renewal, if a laboratory is found out of compliance or otherwise unable to comply with any of the Certification Requirements, The Non-GMO Project will notify laboratory via email of their non-compliant status. In a

timely manner, and in no event more than thirty (30) days post-notification, laboratory must provide The Non-GMO Project with a written plan and proposed cure period for returning to compliance. The Non-GMO Project may accept or reject the proposed cure period, at The Non-GMO Project's sole discretion, based on the nature of the non-compliance and commercially reasonable standards. If the Project is unable to accept the proposed cure period, the Project may propose an alternative cure period. If at the end of the agreed-upon cure period the laboratory is still unable to comply with all requirements, the laboratory shall be deemed a "Defective Laboratory" and/or a "Terminated Laboratory", as defined in the Non-GMO Project Approved Laboratory Agreement and may lose all rights to use The Non-GMO Project's Trademarks and to provide the Services in connection with the Product Verification Program.