

# **Nor-Feed**

Disclosure Report Date Submitted: September 13th, 2024

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### **Disclosure Materials**

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



## **Disclosure Questionnaire**

#### **Industries and Products**

#### Yes No Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** Chemicals $\square$ **Disclosure Alcohol Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\overline{\mathbf{A}}$ <u>Industries</u> Gambling $\square$ **Genetically Modified Organisms** $\square$ Illegal Products or Subject to $\square$ **Phase Out** Industries at Risk of Human $\overline{\mathbf{A}}$ **Rights Violations Monoculture Agriculture Nuclear Power or Hazardous** $\square$ **Materials** Payday, Short Term, or High $\overline{\mathbf{A}}$ **Interest Lending** Water Intensive Industries $\square$ **Tax Advisory Services** $\square$

#### **Outcomes & Penalties**

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior		V
Breaches of Confidential Information		V
Bribery, Fraud, or Corruption		N
Company has filed for bankruptcy		V
Consumer Protection		V
Financial Reporting, Taxes, Investments, or Loans		N
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N
Labor Issues		Ŋ
Large Scale Land Conversion, Acquisition, or Relocation		N
Litigation or Arbitration		N
On-Site Fatality		N
Penalties Assessed For Environmental Issues		V
Political Contributions or International Affairs		$\searrow$
Recalls	V	
Significant Layoffs		V
Violation of Indigenous Peoples Rights		V
Other		$\vee$



#### **Practices**

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	V	
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		N
Company prohibits freedom of association/collective bargaining		$\searrow$
Company workers are prisoners		V
Conduct Business in Conflict Zones		$\vee$
Confirmation of Right to Work		V
Does not transparently report corporate financials to government		N
Employs Individuals on Zero-Hour Contracts		N
Facilities located in sensitive ecosystems		N
ID Cards Withheld or Penalties for Resignation		N
No formal Registration Under Domestic Regulations		$\checkmark$
No signed employment contracts for all workers		$\checkmark$
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		<b>\</b>

	Yes	No
Sale of Data		V
Tax Reduction Through Corporate Shells		V
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		$\searrow$
Workers paid below minimum wage		N
Workers Under Bond		✓
Other		$\checkmark$

### Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		V
Child or Forced Labor		$\checkmark$
Negative Environmental Impact		V
Negative Social Impact		$\checkmark$
Other		<b>✓</b>



Disclosure Questionnaire Category: Energy and Emissions Intensive industry

Nor-Feed is involved in the production/sale of products, or is part of an industry that can potentially be classified as energy and emission-intensive, meaning that they are more likely to have significant impacts on the environment based on their carbon emissions associated with their operations and their contribution to climate change. Certified B Corps are required to make transparent their involvement in such activities or industries.



**Disclosure Questionnaire Category: Water Intensive industry** 

Nor-Feed is involved in the production/sale of products, or is part of an industry that can potentially be classified as water intensive, meaning that they are more likely to have significant impacts on the environment, such as water stress or depletion of local water sources if water use is not appropriately managed. Certified B Corps are required to make transparent their involvement in such activities or industries.



**Disclosure Questionnaire Category: Recalls** 

Issue Date	February 24, 2022
Topic	Recalls due to the existence of an ethylene oxide contamination
Summary of Issue	Nor-Feed invents, manufactures and markets natural plant extracts for animal nutrition and health since 2003. Nor-Feed has experienced one recall over the last 5 years, of their Tea Seed Cake product they import from China as a result of an ethylene oxide contamination. The cause of the contamination was from a raw material used in the elaboration of the Tea Seed Cake product. This contamination was detected during an internal inspection.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The import was 20,000 kg of Tea Seed Cake. The tea seeds products were contaminated at 0.23 ppm. For the record the MRL (Maximum Residue Level) of this contaminant is 0.1 ppm in the EU and 7 ppm in the USA.
	At the time of the alert, 10,413 kg of Tea Seed Cake remained in stock. 9587 kg of Tea Seed Cake had been used in the production of 20,505 kg of finished products.
	The processing of all volumes has been validated with the French authorities.
	In 2022 Nor-Feed sold 1,587,000 kg. This recall represented less than 2% of the total volume marketed in 2022.
Impact on Stakeholders	Ethylene oxide is a well identified contaminant that presents risks for human health (cancerogenic). This is why the authorities have defined MRLs. Unfortunately, there is no consensus on these MRLs (currently 0.1 ppm in the EU and 7 ppm in the USA). No illnesses were reported. The rapid detection allowed for an immediate recall before the product was used in manufacturing by the customer.
Resolution	In addition to processing and destroying non-compliant products, Nor-Feed worked with its supplier to find uncontaminated lots and to arrange for on-site ethylene oxide testing with an independent laboratory.  Nor-Feed also sought alternative suppliers.
Implemented	The safety of Nor-Feed products is assured by their quality



Management Practices	assurance system which meets the Quality and Feed Safety Management System (FAMIQS, see link below) standard. Nor-Feed is audited annually by an independent certification body and has been FAMI-QS certified since 2007; a quality and safety system certification for specialty feed ingredients and mixtures.  As part of a continuous improvement process, Nor-Feed's quality system evolves every year.
Report	FAMIQS certified organizations



### **Disclosure Questionnaire Category: Animal Testing**

Topic	Company conducts animal testing through trials done by third-party for the completion of regulatory or scientific dossiers.
Summary of Issue	Nor-Feed is a manufacturing company that invents, manufactures and markets natural plant extracts for animal nutrition and health and some of its products are required to be tested on animals in accordance with <a href="Directive 2010/63/EU">Directive 2010/63/EU</a> . The products developed and marketed by Nor-Feed are intended for animal feed.
	The scientific research work conducted in partnership with the University of Angers (dry grape extract PhD thesis) or with Oniris (melissa extract) includes animal testing, conducted with the approval of the relevant ethical committee. It concerns mainly dogs and laboratory animals, more rarely farm animals (poultry). More generally, the company tries to utilize in vitro and ex vivo trials that are complementary to animal trials, as part of their research work.
	The testing done in accordance for the completion of regulatory or research purpose includes testing on dogs that have a special regulatory position and testing on farm animals with specific breeding conditions such as experimental infestations or stress conditions. These experimental conditions are governed by <a href="European Food Safety Authority">European Food Safety Authority (EFSA) guidelines</a> . They aim to minimize animal suffering and use the minimum number of animals necessary to obtain valid results. They also include strict requirements for study design, methodology and reporting of results.
	Trials on dogs involve taking blood samples to monitor the performance of the tested additive. These blood tests are carried out by veterinary surgeons in referenced kennels.
	The vast majority of the trials conducted on animals organized by Nor-Feed or in which Nor-Feed is involved are excluded from the scope of Directive 201/63/EU. These trials are nutritional trials using products authorized under commercial farming conditions.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	84% of the company's revenue in the fiscal year end of 2022 involved products that were subjected to animal testing. The revenue generation through products that require animal testing



	is fairly stable from one year to the next.
Impact on Stakeholders	Animal testing and experimentation is widely used to develop new agricultural products and to test the safety of other products. Many of these experiments can cause pain to the animals involved or reduce their quality of life in other ways.
Implemented Management Practices	The alternative to animal testing is the use of existing published data, which is the route chosen by Nor-Feed as much as possible. When there is no data available, the requirements of the registration dossier leaves no room to alternatives.
	When purchasing a trial, Nor-Feed ensures that the provider has practices that comply with directive 2010/63/EU and that it has a formalized internal procedure for authorizing the trial. Finally, when using the results, EFSA (as part of a registration file), higher education institutions (as part of a thesis) or scientific journals (when publishing) ensure that animal welfare regulations have been respected.
Management Comments	Nor-Feed's trials focus mainly on the nutritional performance of products. These trials are carried out under commercial conditions that take animal welfare into account. They consist of recording performance results of FEED products tested (for example: recording the animal's weight) and are non-invasive. They can't cause pain to the animals involved or reduce their quality of life in other ways.
	Product safety tests are carried out upstream. They are not carried out in vivo. Literature reviews are carried out first, followed by ex-vivo (Use of cell models or tissue culture systems) or in-silico (Simulation and modeling of the biological effects of molecules) experiment if necessary.
	The company implements ex-vivo solutions as soon as possible (e.g. the last Nor-Grape test required to comply with European Union regulations was carried out on the corneas of cattle from slaughterhouses and not on animals used voluntarily and exclusively for this purpose). They also carry out in-vitro tests to ensure feed safety - mutagenicity test on Salmonella or COMET assay for genotoxicity.
	Moreover, Nor-Feed has also developed a research model based on Tenebrio molitor to assess the evolution of the intestinal microbiota and avoid more animal testing. It is part of Dr. Sekhou Cissé PhD thesis.