

# VLOG FAQs

Frequently asked Questions about VLOG-certification and the Use of the “Ohne GenTechnik” and “VLOG geprüft” Seal

*Explanation: FAQs that were added or updated during the last 6 months are **marked orange**.  
FAQs, that were added or updated during the last update are **marked red**.*

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## VLOG-Certification Basics

### General

**1 ] Which companies must be certified in conformity with the “Ohne Gentechnik” Production and Certification Standard? (14.03.2018)**

Apart from the general requirements, the “Ohne Gentechnik” Production and Certification Standard is divided into the stages of Logistics, Feed, Matrix Organisation, Agriculture, Group Organisation Agriculture, Food Processing and Retail of bulk food. The first chapter of each stage (e.g. B1, C1 or E1) points out which activities require certification as well as those that don't require certification.

**2 ] Which certifications are considered to be equal to the certification against the “Ohne Gentechnik” Production and Certification Standard? (14.03.2018)**

You can find a document with all standards regarded as equivalent to the VLOG standard [here](#).

**3 ] Is a certification specific to one product or may product groups also be certified? (updated on 01.11.2019)**

Product groups as well as individual products (such as production on selected production lines) may be certified. The scopes for certification defined in the VLOG Standard have to be regarded and listed on the certificates. It is possible to specify the scopes for products or product groups further on the certificate or in an annex.

**4 ] How much does VLOG the certification cost? (updated on 04.10.2019)**

The costs for VLOG certification are charged by the VLOG-recognised certification body that is assigned to the certification of the business.

In case the company wants to use the seal "Ohne GenTechnik" (food) or "VLOG geprüft" (feed), VLOG charges a licensing fee for the use of the seal. For food the [fee](#) depends on the turnover earned with the licensed products. For feed the [fee](#) depends on the total turnover of the company.

### VLOG-Certification Abroad

#### Certification within the EU

**5 ] May businesses within the European Union (outside Germany) be generally certified according to the VLOG Standard? Which special features have to be taken into consideration? (14.03.2018)**

In principle, businesses in the EU may be audited and certified according to the VLOG Standard because the labelling reliability of the feed labelling is ensured by the EU Directives No. 1829/2003 and 1830/2003.

However, in case of activities outside Germany, it is important to note that the audit documents are submitted to VLOG in German and/or in English. It has been agreed upon with the certification bodies that the documents for agricultural holdings may be presented in the national language but that upon request of VLOG the documents are to be translated by the certification body and submitted to VLOG within five working days.

**6.] Are the legal prerequisites in Austria (Codex guidelines) and in Germany (EGGenTDurchfG) considered to be equivalent? (14.03.2018)**

VLOG accepts the certification conditions in Austria with respect to freedom from GMOs equivalent to the VLOG Standard. For this purpose, we have concluded an [agreement with ARGE Gentechnikfrei](#). However, our hands are tied when the German legislator, in its requirements for “Ohne Gentechnik” labelling, goes beyond the requirements of the Codex. For example, this is the case when it comes to the tolerated carryover of genetically modified organisms in food additives. In the current queries, this aspect is probably of special significance for you. The Codex follows the EC Directives No. 1829/2003 and 1830/2003. Accidental or technically unavoidable carryover of up to 0.9 percent per ingredient is tolerated. In conformity with the EC Genetic Engineering Implementation Act (EGGenTDurchfG), only carryover up to the detection limit of 0.1 percent per ingredient is tolerated in Germany.

For feed, certification procedures have been mutually recognised between Austria and Germany.

Certification outside the EU

**7.] May businesses outside of the European Union and/or in third countries be certified against the VLOG Standard? (14.03.2018)**

Businesses in countries outside the European Union may be certified only after consultation with VLOG. Differences in legislation are one reason, among others. EU Directives No. 1829/2003 and 1830/2003 apply for labelling of GMO feed and food within the EU. If there are no such legal regulations outside the EU, for example, the requirements for the process of feed procurement have to be revised because no farmer can gather from the delivery slip whether the feed purchased is GMO-free or contains GMOs.

## Conversion to VLOG

### General

**8 ]** How long have the animals to be fed with GMO-free feed for the products to be awarded the "Ohne GenTechnik" seal? (14.03.2018)

For food with the "Ohne GenTechnik" seal, the animals used for the production of the food must not have received any genetically modified feed. The minimum feeding times are listed in the Annex of the EGGenTDurchfG and in the VLOG Standard (chapter E).

In terms of chickens used for meat production, for example, "ohne Gentechnik" conform feeding is required for the complete lifetime because the animals are slaughtered no later than approx. thirty days after hatching.

With respect to GMO-free milk, however, the farmer must not use genetically modified feed for three months beforehand. After conversion he has to continue feeding "ohne Gentechnik".

**9 ]** In conformity with the EGGenTDurchfG, the conversion period for beef is "twelve months, and in any case at least three-quarters of their life." How is this regulation applied in practice? (14.03.2018)

In the conversion of cattle, both provisions have to be taken into consideration, i.e. twelve months as well as three-quarters of the lifetime.

The starting point is the age of the animal at the beginning of the conversion time.

Example: The cow is already 2.5 years (30 months) old at the time of conversion to "ohne Gentechnik" conform feeding. As from an age of ten years, the meat/animal can be marketed labelled as "Ohne Gentechnik".

**10 ]** Will the audit be carried out within the minimum feeding time or only after the minimum feeding time is completed? (14.03.2018)

The audit may also be carried out during the requested minimum feeding time.

**11 ]** Why do the animals not have to be fed GMO-free their entire life? (14.03.2018)

Of course, it would be desirable that the animals receive as little as possible or even no genetically modified feed at all.

By means of the periods set the legislator has taken the situation into account that "Ohne Gentechnik" production has to gather momentum first. In this respect, the legislator has accommodated the farmers who want to convert to GMO-free production. The hurdles should not be too high; otherwise there is a risk that many food producers will not even make a start on "Ohne Gentechnik" production. Neither the environment nor the consumers would benefit in this case.

**12 ]** May a manufacturer of raw materials of animal origin (e.g. dairy) be certified if not all suppliers have converted and a separation of the suppliers is not possible at the plant? (14.03.2018)

No, under these circumstances the manufacturer may not be certified. The requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) must be met for all raw materials used in "Ohne Gentechnik" products. Thus, in case of milk as a raw material it has to be ensured that the minimum feeding time required by law is observed by the agricultural operations.

## Conversion Requirements for organic Farms

### 13 ] May the conversion times required to switch to organic production be taken into account for the minimum feeding time for the production of “Ohne Gentechnik” products? (14.03.2018)

The requirements of the EC Regulation on Organic Production and Labelling and the EGGenTDurchfG on the feeding of animals are identical with respect to the GMO-free status of the feed. For this reason, the conversion times required to convert to organic production may be taken into account in keeping with the EGGenTDurchfG. No double audit in conformity with the VLOG Standard and the EC Regulation on Organic Production and Labelling is required.

Exemption for Beef:

For cattle, however, it has to be looked into which conversion variant the organic farm has chosen. The EGGenTDurchfG does not contain any regulation for 24-month conversion of an entire farm. The minimum feeding time of twelve months and at least three-quarters of the lifetime always applies for cattle used for meat production. This means that not necessarily every converted organic cow may be automatically marketed as “ohne Gentechnik”.

So, for beef, the following documents have to be on file in the incoming goods department of the marketing company:

- Written confirmation from the certification body of the business stating the date as of which the business has fed organic and GMO-free feed exclusively in their cattle segment.
- If already on file: Certificate attesting the organic production of the farm
- Confirmation on the delivery slip of the supplying farm that the minimum feeding time of twelve months and three-quarter of the lifetime has been observed in conformity with the EGGenTDurchfG.

### 14 ] In the event of longer minimum feeding times (milk-producing animals), may the goods already be sold as “Ohne Gentechnik” products after the minimum feeding time specified in the EGGenTDurchfG has expired? Is a specific VLOG audit required in this case? (14.03.2018)

Under the following conditions, no special VLOG audit is required in this case:

- An audit has already been carried out within the minimum feeding time in conformity with the EGGenTDurchfG.
- The certification body has confirmed the starting date of the conversion time.

## Logistics

### General

**15 ]** A supplier delivers not risk prone feed (e.g. wheat, mineral feed) to a farmer. Does the supplier (and feed) have to be VLOG-certified for the farmer to be in risk category 0? (as of 11.05.2018)

No, the supplier (e.g. trader or feed manufacturer) doesn't have to be VLOG-certified. If the feed is not risk prone (see E 4.9.1) and not compulsory to labelling according to (EC) No. 1829/2003 and 1830/2003 no further proof is required.

**16 ]** When is the combined checklist logistics and feed manufacturing to be used? (updated on 07.10.2019)

The checklist can for example be used in the following cases:

- Manufacturers that also want to convert feed into "VLOG geprüft"/"VLOG verified" feed (manufacturing and logistics have to be checked here)
- For feed manufacturer, which do also trade with feed it can make sense because of different analyses and to maintain a better overview
- Traders, which also have mobile grinding and mixing facilities
- Manufacturers which also offer storage/transport as external service providers for other VLOG-companies segregated from the own production.

Manufacturers, which only want to have their own storage/transport checked in the audit, the use of the normal feed manufacturing checklist is sufficient.

### Trade and Drop Shipping

**17 ]** Under what circumstances may a trader claim that non-VLOG-certified feed is "VLOG geprüft"? (updated on 07.10.2019)

Not certified single component feed, which can be analysed on GMO, can be converted into "VLOG geprüft"/"VLOG verified" quality by a VLOG-certified trader. For doing this, the trader has to fulfil the requirements of chapter B 7 in Standard 20.01).

If the "VLOG geprüft"/"VLOG verified" seal is to be put on the goods, the business must also submit an application to VLOG for use of the seal.

**18 ]** A VLOG-certified dairy operator purchases VLOG-certified milk from another dairy operator on the spot market via a trader. Question: does the trader that also transports the milk have to be VLOG-certified to be able to transport the goods? (updated on 26.09.2018)

Yes, the trader that is in possession of the milk and transports it must also be certified according to the VLOG Standard given the risk of commingling. That is if the "VLOG"-status of the milk shall be maintained. An exception to the obligation is defined in chapter B1 of the VLOG Standard.

**19 ]** A separate distributor deals with packaged VLOG-certified food. Must the distributor also be VLOG-certified to be allowed to use the "Ohne Gentechnik" seal for its sales? (14.03.2018)

The certification obligation applies only up to the business that does the packaging for the consumer. Thus, legally independent distributors are not subject to certification.

However, an application for use of the "Ohne GenTechnik" seal must be submitted to VLOG by the business.

**20 ]** A company sells bulk feed/products to a customer. Another legal independent company (e.g. GmbH) belongs to the company and does issue the invoices for the feed/product. Does this GmbH also have to be certified to keep up the certification-status of the feed/product? (15.01.2020)

If the contract of sale and the execution (incl. issuing of bills of lading and checking of the certificate) are organised directly between company and customer and only the issuing of invoices is outsourced to the independent company, this company does not have to be VLOG-certified.

## Transport

**21 ]** What proof must be on file if a food processor (e.g. dairy operator) assigns the transportation of bulk food (e.g. milk) to a logistics business? (14.03.2018)

According to chapter B 1 of the VLOG Standard, the transportation business does not require a separate certification, provided that all of the following three requirements are fulfilled with sufficient proof:

- The order is given by a VLOG-certified dairy
- Transportation is part of the risk management of the VLOG-certified dairy
- There is an agreement between the transporter and the certified dairy operator for complying with the logistics requirements of the VLOG Standard.

## Handling/Storage

**22 ]** Which circumstances have to be fulfilled for a warehousing/handling business to label feed as "VLOG geprüft"? (updated on 26.09.2018)

To be eligible for a "VLOG geprüft" labelling or seal, the feed and the warehousing/handling business must undergo VLOG certification. Purchased feed/raw materials have to be certified according to the VLOG Standard or have to be converted into "VLOG geprüft"/"VLOG verified" by a certified trader or commissioned by a certified trader. Converting is only possible for single component feed that can be analysed on GMO (see chapter B of the VLOG Standard).

If the "VLOG geprüft"/"VLOG verified"-seal is to be put on the feed, the business must also submit an application to VLOG for use of the seal.

## Feed

### General

#### 23 ] What requirements does feed need to fulfil to be used in the “ohne Gentechnik”-production? (updated on 19.12.2019)

Feed used in the “ohne Gentechnik” system may not be obligatory to labelling according to the rules of Regulations (EC) No. 1829/2003 and/or No. 1830/2003. Therefore, it must neither be labelled nor be subject to labelling obligations if it were brought into the market. Feed that is certified against VLOG Standard may always be used for the production of “ohne Gentechnik” food.

#### 24 ] May feed that contains components of animal origin (skim milk powder, milk powder, etc.) that do not fulfil the requirements of the EGGenTDurchfG (minimum conversion feeding periods) be used for “ohne Gentechnik” production? (14.03.2018)

For feed, the labelling obligation pursuant to EU Regulations Nos. 1829/2003 or 1830/2003 is relevant. Milk from cows that have been fed with GMO feed, or the respective processing products are not subject to compulsory labelling pursuant to the regulations mentioned. Products of animal origin may thus be used in the "ohne Gentechnik"-production and in the production of VLOG-certified feed.

#### 25 ] Which standards can be recognised as equivalent to the VLOG certification? (updated on 19.12.2019)

VLOG has recognised the following [standards as equivalent](#) to the VLOG “Ohne Gentechnik” Production and Certification Standard. Other standards may not be considered as equivalent without further consultation with the VLOG office. For this to happen, thorough benchmarking by the VLOG office is required. Please contact VLOG if necessary.

#### 26 ] What happens to "Ohne GenTechnik" food of animal origin if it is later on found that the feed should have been labelled as being genetically modified? (updated on 01.11.2019)

Manufacturers and dealers must not fear any legally induced product recalls. The legislator has taken measures to clearly reduce the liability risk. Even if the analysis of the feed used by an agricultural holding reveals that contrary to the statement on the delivery slip or accompanying document the feed should have been labelled as being genetically modified, it is not mandatory to recall the goods already produced. The EGGenTDurchfG constitutes the legal framework for the “Ohne Gentechnik” labelling. In Section 3a, Paragraph 4, it says:

“In case of food or food ingredients of animal origin, the animal which is processed into food must not have been given feed which is marked pursuant to Articles 24 and 25 of the EU Directive 1829/2003 or Articles 4 or 5 of the EU Directive 1830/2003...”

Quite deliberately, the wording refers to the actual state of the declaration of feed at the moment of feeding of the animals and not how the feed should have been labelled. Even if it turns out later on that the feed should have been declared, the milk, the eggs and the meat are considered produced in conformity with the EGGenTDurchfG and may be marketed with the “Ohne Gentechnik” label. Of course, incorrectly declared feed still available must not be used further for “Ohne Gentechnik” production. Depending on the amount of the feed and its GMO-content it can be necessary to start the conversion period anew. For further information please see the [VLOG guideline for handling mislabeled feed](#).

## Agriculture

### 27 ] What feeds are graded as at-risk by the farmer? (updated on 26.09.2018)

The risk assessment (at-risk or not at-risk) has to be done by the farmer according to chapter E 4.9.1 of the VLOG standard. Feed that does not contain soy, corn/maize, sugar beet, cotton or rapeseed/canola can always be graded as not at-risk.

### 28 ] A farmer feeds food (e.g. bread) to his VLOG animals. What criteria must the feed producer (in this case the baker) fulfil for VLOG certification to continue? (14.03.2018)

The following criteria must be fulfilled:

- a) The feed (in this case the bread) must have undergone quality control and successful PCR analyses. On the basis of the analysis results, the food (e.g. bread) must not be subject to compulsory labelling pursuant to Regulation (EC) 1829/2003 and Regulation (EC) 1830/2003.
- b) The farmer must have a confirmation from the supplier that the food (e.g. bread) is not subject to compulsory labelling pursuant to the above-mentioned regulations.

### 29 ] Is the dual use of feed mixers for feed not subject to compulsory labelling/"VLOG geprüft" feed and feed subject to compulsory labelling possible? (updated on 05.09.2018)

Dual use is to be understood as the use of the same mixer for VLOG feed/feed not subject to compulsory labelling (pursuant to Regulation EC 1829/2003 and 1830/2003) on the one hand and feed subject to GMO labelling on the other hand.

Alternating use of the feed mixer for GMO and non-GMO feed is possible only after thorough (wet) and documented cleaning after the GMO feed or a system purge with feed exempt from mandatory labelling.

If a business decides to use system purges, it is responsible for ensuring that the system purge is sufficient in terms of quantity and technical characteristics. The system purge is regarded as efficient if it prevents commingling/carryover, such that the labelling obligation according to EU Regulations 1829/2003 und 1830/2003 does not apply. If doubts arise, auditors may verify the functionality of the system purges (or have it verified) by analysis.

Facilities that rely on dual use of feed mixer trucks are to be classified in Risk Class 2.

## Feed Businesses

### 30 ] What feeds are graded as at risk by the feed company? (updated on 19.12.2019)

For "VLOG geprüft" production or labelling, feed businesses are obligated according to the "Ohne Gentechnik" Production and Certification Standard to carry out an individual risk assessment (risk-prone/not at risk) of the feed material used. In doing so, the [following document](#) may be used as an assessment aid. Feed that does not contain soy, corn/maize, sugar beet, cotton or rapeseed/canola can generally be graded as not at-risk.

## Bills of Lading

### 31 ] May the "VLOG geprüft" seal be used on delivery slips or other documents? (14.03.2018)

The "VLOG geprüft" seal (and also "Ohne GenTechnik" seal) may be used on delivery slips or other internal/external documents if the business has concluded a Licence Agreement with VLOG.

**32 ]** Do product-specific labels that are found on feed sacks, for example, need to be saved or is the delivery slip sufficient? (14.03.2018)

The document on which the feed is declared is relevant. Often, that is the delivery slip. However, if the ingredients are NOT listed on the delivery slip, then the farmer must save both the labelled feed bag AND the delivery slip.

**33 ]** Does the obligatory labelling "VLOG geprüft"/"VLOG verified" on bills of lading (e.g. delivery slip) have to be put in the article description of the certified feed or is it also possible (e.g. in case of shortage of space) to label the certified feed at another place? (30.01.2020)

Apart from the labelling in the article description, it is also possible to use a footnote, asterisk (\*) or similar which is explained on the slip. If a delivery only contains VLOG certified feed, it is also possible to add a sentence that makes clear that all feed on the delivery slip is "VLOG geprüft"/"VLOG verified".

## Additives

**34 ]** May vitamins, enzymes and additives that were produced from or with the help of genetic engineering be used in feed for the "ohne Gentechnik" production? (14.03.2018)

Vitamins and additives produced with the help of genetic engineering, such as amino acids, may be used in animal feed. This corresponds to the EU labelling regulations for genetically modified feed: Only feed that contains or is produced from genetically modified plants must be labelled as "genetically modified".

Vitamins and amino acids are added to the feed of livestock to keep the livestock healthy and productive. Genetically produced vitamins and additives are not themselves genetically modified and therefore may be used in the "ohne Gentechnik" production. The genetically modified microorganisms used for this production may not itself be contained in the feed.

## Agriculture

### Grading Risk Categories

**35 ]** A farmer has a dairy cow stable in which there is no risk that the cows come into contact with GMO feed. During the dry period, however, the farm occasionally relocates its cows to another farm that is not VLOG-certified. Which risk grade must be stated in this case? (14.03.2018)

The feeding of the dry cows is relevant for “Ohne Gentechnik” production, and for this reason the “relocation cow stable” has to be included in the audit process.

One audit has to take place at this stable within the scope of the initial audit and it has to be reported when animals are relocated. The “relocation cow stable” and/or the feeding must be audited if this option is used during the audit period. The farmer’s reports are to be checked against the reports in the HIT lists; VLOG considers a spot-check of “temporally” matching cows in the stock register and their whereabouts to be expedient.

The risk grade must then be chosen according to the criteria found in both farms.

**36 ]** A separate silo with a unique identifier (number, letter, etcetera) is used for GMO feed and is located in the GMO-free area of an agricultural operation. The feed is fed through a pipe system directly from the silo into the stable. Can risk category 0 be used in this case? (14.03.2018)

Grading into risk category 0 is possible only when the feed is non-swappable feed subject to labelling.

**37 ]** What is the risk category when an agricultural operation grows feed that is regarded as risk prone (e.g. corn/maize or canola)? (14.03.2018)

Assuming that the cultivation of the species as GMO is forbidden in the country and the farmer can show the seed declarations in the audit, this feed can be graded as not at risk. If there are no other genetically modified components on the farm, the risk category 0 can be applied.

## Group Certification Agriculture

### General

**38 ]** Chapter F 2.2.7 prescribes the distribution of audit reports to the agricultural members of the group. Can the group organiser fulfil this requirement by uploading the reports on a website? (as of 04.02.2019)

Yes, alternatively to sending the report via Mail, Email, Fax or similar, it is also possible to have it available for download on a website. Three conditions have in this case to be fulfilled: the member is informed where to find the report, the member has access to the website and the security of data is assured.

**39 ]** Can an agricultural company with individual certification be admitted into a VLOG-group? (as of 04.03.2019)

Yes, the company can be converted into a group member. The following steps are necessary:

- Certification has to be transferred to the new certification body (if different from the former certification body): an exchange of relevant documents/information between the certification bodies has to take place (see chapter A 3.11.4 in VLOG standard). The contract with the former certification body has to be abrogated.
- The individual certification is converted into a group certification: the group organiser and the new certification body take the company into the group (e.g. adding to the member list, checking/correcting the risk category, including into risk management, contract between group organiser and company...)
- The company abrogates the standard usage agreement with VLOG (information to [info@ohnegentechnik.org](mailto:info@ohnegentechnik.org) including the information, that the company will go into group XY) and does no longer have an own VLOG-ID.

After a successful transfer of the data, the new certification body can decide to acknowledge the last audit of the company as an audit in the group certification --> the new audit period is then calculated based on the date of the last audit.

**40 ]** What is the procedure, if a routine audit at the agricultural group member takes place earlier than obligatory? (08.11.2019)

If a group member is audited in an earlier calendar year than necessary. the following audits also have to take place earlier.

**Example:** a farmer in risk category 0 had his last audit in 2019 and the next audits have to take place in 2022 and 2025. Now the audit does take place in 2021 instead of 2022. Therefore, the next audit (and all following) has to take place one year earlier, too (in this case 2024 instead of 2025). By this, it is secured that an audit always takes place at latest in the third year after the last audit.

### Initial Certification

**41 ]** A farmer who is to participate in a group certification does not want an inspection by an auditor from the certification body. In this event, is a document inspection by the certification body and an inspection by an agricultural advisor on behalf of the group representative sufficient for admittance to the group? (14.03.2018)

No, VLOG sees no reason to allow an exception from an on-site audit by a neutral auditor.

**42 ]** Does an employee of the group organiser always have to drive to the group member's business for the initial data collection or is it sufficient for the group organiser to send an email with the data collection questionnaire to its members, e.g. 1000 farmers? (14.03.2018)

On-site inspections by the group organiser are a clear requirement of the "Ohne Gentechnik" Production and Certification Standard.

**43 ]** According to the VLOG Standard, "on-site self-monitoring" in agricultural operations must be done by trained employees of the organiser based on the VLOG checklists. Who trains these employees? (14.03.2018)

There are not yet any further requirements for the qualifications of the group organisers' employees. The company Quant Qualitätssicherung, which also does the auditor training, offers training for companies (e.g. internal auditors). If you are interested, please contact Quant Qualitätssicherung directly at [vlog.fra@tentemus.com](mailto:vlog.fra@tentemus.com)

**44 ]** What is the maximum amount of time between the first audit of the farmers and the certification being awarded for the whole group? Shall the audit at the group organiser's headquarter take place after all farmers are audited? (updated on 04.10.2019)

There is no temporal limitation in the VLOG Standard and it is not determined in which order the companies have to be audited. The initial certification of the group is possible only if at least 25% or 100% of the facilities and the group organiser itself have been audited. If the initial certification-process takes so long that the audit interval of a farmer has already ended at the time of the initial certification, the farmer can only be added to the group without another audit.

## Group Organiser

**45 ]** Can the certification body be the group organiser? (as of 05.10.2018)

No, a certification body can't be group organiser of a group that is audited by the same certification body. An independent control in that case would no longer be possible.

**46 ]** Are group organisers (e.g. dairy operators) responsible for the sampling and analysis of feed? (updated on 04.10.2019)

Within the scope of the risk management and the analysis plan that is part of it, the group organiser must secure and prove that the farmer fulfils the testing requirements of the VLOG Standard. For every farmer and audit interval the test results demanded in part E have to be on hand.

In the event of deviations/positive results, it may be necessary for the group organiser to arrange further analyses as corrective measures.

The certification body can take care of sampling and sending samples to a laboratory.

## Food Processing and Manufacturing

### General

**47 ]** May a slaughterhouse use the same scalding water to process "VLOG" animals and not "ohne Gentechnik"-conform animals? May a dairy operator use the same saline bath to process "VLOG"/"Ohne GenTechnik" cheese and not "ohne Gentechnik"-conform cheese? (updated on 02.11.2018)

Provided that no parts of the boiling water of the not conform meat (e.g. fat) enter the "VLOG" meat and no parts of the saline bath of the not conform cheese enter the "VLOG" cheese, the scalding water and the saline bath may be used for both qualities.

**48 ]** Does the manufacturer of dye products for dyed eggs also have to be certified? (14.03.2018)

For dyed eggs, the EGGenTDurchfG not only contains requirements for the eggs, but also for the dye. If dyed eggs shall be brought into the market with the "Ohne GenTechnik" seal, an extension of the existing licensing agreement is necessary. By using the print numbers, it has to be documented that only VLOG-certified eggs are used. Furthermore, the manufacturer of the dye has to submit a [supplier declaration](#) for the dye, stating that the criteria of the EGGenTDurchfG are complied with. If these provisions are fulfilled, the dye factory does not have to be certified to obtain the licence for the "Ohne GenTechnik" seal for dyed eggs.

### Proof of GMO-free, equivalent certification

**49 ]** What does a GMO-free certificate have to look like? (updated on 02.11.2018)

Annex I of the "Ohne Gentechnik" Production and Certification Standard contains, the [VLOG GMO-free certificate](#). Since 01 January 2019, only this certificate is permissible for VLOG certification.

**50 ]** How is the depth of review "back to the last organism capable of reproduction" applicable in practice? (14.03.2018)

According to the EGGenTDurchfG, the definition of the depth of review back to the last organism capable of reproduction (pursuant to Regulation 834/2007), refers only to production "by GMOs" and not "from GMOs".

In practice, that would mean, for example:

1. Example: Dextrose that is prepared microbially may not be produced using GM microorganisms. The nutrient solution in which the microorganisms were grown, however, is no longer taken into account when considering the question of being GMO-free.
2. Example: Maltodextrin is produced using enzymes that were synthesised using GM microorganisms. Maltodextrin, which is used as a carrier for aromas, for example, was thus produced "using GMOs" and is thus not conform with the EGGenTDurchfG or the VLOG Standard.
3. Example: Ethanol, which is used as the carrier of an aroma and is produced from GM corn, for example, would be compliant with the regulations of the EGGenTDurchfG. According to the VLOG Standard, the source material (here corn) may, however, not have been subject to compulsory labelling pursuant to Regulations (EC) 1829/2003 and 1830/2003 (cf. Chapter A1.4 of the VLOG Standard).

**51 ]** What happens if a supplier is not willing to fill in the VLOG GMO-free certificate (Annex I)? Is it also possible for the customer (e.g. food manufacturer) to fill in the [GMO-free certificates](#) by himself? (updated on 07.10.2019)

The use of annex I is obligatory, own declarations are not accepted. If the certificate is not filled in by the supplier, then it may be filled out by the business itself. This can only be done based on GMO test results, a risk assessment or similar.

**52 ]** May the InfoXgen declaration be recognised as equivalent to a VLOG certification? (14.03.2018)

In many cases, an InfoXgen declaration will be sufficient as proof for use in "Ohne Gentechnik" products. However, in several cases, the requirements of the EGGentDurchfG and the VLOG Standard go beyond that of Regulation (EC) No 834/2007 on Organic Production and Labelling. Please see FAQs about the topic "Organic and VLOG" for further information.

**53 ]** Which standards can be recognised as equivalent to a VLOG certification? (updated on 19.12.2019)

VLOG recognises a certification against the [following standards](#) as equivalent to a certification against the VLOG "Ohne Gentechnik" Production and Certification Standard. Other standards may not be considered as equivalent without further consultation with the VLOG office. The recognition requires thorough benchmarking by the VLOG office.

## Bills of Lading and Packaging

**54 ]** Can the "Ohne GenTechnik" seal be used on bills of lading or other documents? (14.03.2018)

The "Ohne GenTechnik" seal can be used on bills of lading, invoices or other business documents if the business has concluded a Sub Licence Agreement with VLOG.

**55 ]** Must the VLOG label be affixed to the outer packaging of the advertised article? (14.03.2018)

If the products are clearly labelled as "Ohne Gentechnik", a label with the "Ohne GenTechnik" seal on the outer packaging is not compulsory.

The identifiability/separation may be ensured also by the following measures, for example:

- Unique product number which the "Without genetic engineering" quality is attributed to in the EDP system
- Pallet identification as "ohne Gentechnik"/"VLOG"
- Defined pallet colour as "ohne Gentechnik"/"VLOG"

**56 ]** Does the obligatory labelling "VLOG" on bills of lading (e.g. delivery slip) have to be put in the article description of the certified product or is it also possible (e.g. in case of shortage of space) to label the certified food at another place? (30.01.2020)

Apart from the labelling in the article description, it is also possible to use a footnote, asterisk (\*) or similar which is explained on the slip. If a delivery only contains VLOG certified products, it is also possible to add a sentence that makes clear that all food on the delivery slip is "VLOG".

## Ingredients, Additives

**57 ]** May genetically modified microorganisms such as bacteria and yeasts be used for the production of vitamins, aromas or enzymes for "Ohne Gentechnik" food? (14.03.2018)

The absence of GMOs from "Ohne Gentechnik" food also extends to bacteria and yeasts that produce additives such as enzymes, aromas and vitamins. E.g., the rennet enzyme for the production of cheese may not stem from genetically modified bacteria.

**58 ] May additives or other substances that are verifiably not available in "ohne Gentechnik" quality be used in "Ohne Gentechnik" food? (updated on 07.10.2019)**

In cases where necessary additives such as vitamins are demonstrably not available in the market in "ohne Gentechnik" quality, additives produced by GMOs may be used. Prerequisite for this exception is that these substances be listed by the EU Commission according to the procedure provided by Regulation (EC) No. 834/2007. At the moment (October 2019) this list is empty.

If a certain additive or other substance is only available as a GMO, then the producer must request that this substance be listed in the Regulation (EC) No 834/2007 on Organic Production and Labelling.

**59 ] Do mineral raw materials (e.g. sodium chloride) have to be certified for use in "Ohne Gentechnik" products? (updated on 07.10.2019)**

Pursuant to the VLOG Standard, for producers of inorganic products (e.g. sodium chloride) there is no certification duty. However, businesses which wish to use these ingredients in "Ohne Gentechnik" products, require a [VLOG GMO-free certificate](#) from the supplier in order to use the ingredient in "Ohne Gentechnik" products.

**60 ] What are the requirements for rennet? (updated on 19.12.2019)**

Natural rennet can be used for the production of "Ohne Gentechnik" food if the animals from which the rennet comes were not genetically modified. It is irrelevant what the animals were fed. The requirements for feeding animals only applies to ingredients (Sec. 3 a Par. 4 EGGenTDurchfG).

According to food law, rennet is not an ingredient because it is used as a processing aid. Prohibiting the use of substances created using GMOs applies to this (Sec. 3 a Par. 5 EGGenTDurchfG). A substance is produced using GMOs if the last living organism in the manufacturing process - in the case of rennet it is the calf - was genetically modified.

For microbial rennet, however, the production by GMO is especially relevant. A [VLOG GMO-free certificate](#) is necessary in this case to use the rennet in "VLOG" products.

## Retail – Sale of Bulk Food of Animal Origin

### 61 ] Does the group description have to be on file at the branches? (14.03.2018)

The group description does not need to be on file at the branches in printed form if the branch can technically access it at any time (e.g. business server).

### 62 ] Does the list of suppliers have to be on file at the branches? (14.03.2018)

It is possible that the supplier list is on file only at headquarters if the branches can order bulk goods in “Ohne Gentechnik” quality only using the goods management system and if only recognised suppliers can be ordered from through that system. This process must be described in the group description.

## Grinding and Mixing Facilities

### General

**63 ] Do mobile grinding and mixing facilities have to be certified for the use in the VLOG-production? (updated on 07.10.2019)**

No, there is no certification obligation unless the operator wants to label mixed feed as "VLOG mixture". However, certification influences the farmers' grading into the risk categories from 0 to 2 (see chapter E 2.1 of the VLOG Standard).

**64 ] Are feed mixers considered mobile grinding and mixing facilities in terms of the VLOG Standard? (14.03.2018)**

No, feed mixer that are used, for example, for daily feeding of silage and concentrated feed are not mobile grinding and mixing facilities in terms of the VLOG Standard. Mobile grinding and mixing facilities are used only for dry feed components such as grains.

**65 ] Can a farmer get in risk category 0 if he uses a mobile grinding and mixing facility that is certified against Regulation (EC) No. 834/2007 (organic production) but not VLOG? (updated on 07.10.2019)**

This depends on the certification of the feed that the farmer orders to be mixed/grinded in the facility. If organic certified feed is processed no additional VLOG-certification of the facility is necessary to reach risk category 0. If the feed is not organic-certified a VLOG-certification of the facility is necessary to let the farmer reach risk category 0. If no additional VLOG certification is available, the farmer gets in risk category 1.

**66 ] If a VLOG-certified mobile grinding and mixing facility trades with "VLOG geprüft" / "VLOG verified"-oil, is it necessary for the facility to be additionally certified for trade? (as of 15.07.2019)**

If the company does only trade with VLOG-certified oil but no with other "VLOG geprüft"-feed, the certification for Feed Manufacturing – mobile grinding and mixing facility is sufficient and no additional certification for trade is necessary.

**67 ] What happens if there is no facility report available for the mobile grinding and mixing facility? (14.03.2018)**

A confirmation from the manufacturer in which information regarding the preciseness of the work/removal of residues/carryover is sufficient as an alternative to a facility report. Such a document should be requested by the business unless it is already on file. If there is evidence that the grinding and mixing facility is used only for VLOG-certified goods or goods not subject to compulsory labelling, such a confirmation is dispensable.

**68 ] When does the carryover test (required from 2020 on) have to be performed by grinding and/or mixing facilities, that are already VLOG-certified? (as of 10.12.2019)**

In Version 20.01 of the VLOG standard an obligatory carryover test is implemented for mobile grinding and/or mixing facilities (see chapter C 6.2). Facilities that are already certified have to conduct this carryover test **before 01.01.2021**.

At the beginning of 2020 VLOG will publish a guideline for conducting the carryover test. This guideline will be available [online](#) under "Further Documents/Instructions"

**69 ] Is it possible to adapt the VLOG-audit interval of grinding and/or mixing facilities to the QS-audit interval after the VLOG certificate was issued? (10.12.2019)**

By Version 20.01 of the VLOG standard it is possible for grinding and mixing facilities to adapt the VLOG audit interval to the audit interval of QS. The preconditions and further information can be found in chapter C 2.1. Upon request, the validity period can be extended even after the issuance of the certificate by the certification body if the requirements are fulfilled.

**70 ] Do the components of the mixture have to be stated on every mixing protocol or is it sufficient to have a documented mixing instruction in place? (19.12.2019)**

If the same mixtures are periodically produced for the farmer by the mixing facility, it is sufficient to have a (digital) deposited mixing instruction. By using that instruction, it has to be possible to examine afterwards which instruction the single mixture can be clearly associated with. In case the single mixture differs from the instruction, this change has to be documented on the mixing protocol/bill of lading (e.g. "today 300 kg instead of 400 kg wheat have been used").

**71 ] From 01.01.2020 it is obligatory to label a mixture as "VLOG mixture". Does the facility operator now have to dispose of documents (e.g. blocks of mixing protocols) that still hold the former wording "VLOG geprüft"? (15.01.2020)**

It is possible for the operator to use up documents with the wording "VLOG geprüft" that have been purchased/printed out until 31.12.2020. This only applies to documents, that have been purchased/printed out before 01.01.2020, more recent documents have to be labelled with the wording "VLOG mixture".

## Sampling and Analysis

**72 ] What does a written consent for sampling look like? (updated on 07.10.2019)**

As there is no template for this consent, it may be created as needed. The consent must clearly explain which party it concerns.

For example, the following wording can be used: "I/We, [name and address of the farm] allow the company, [name, address of the grinding and mixing facility], to take samples from "VLOG mixtures", which have been mixed by the company. These samples may be tested on GMO in a laboratory".

**73 ] Is it necessary to take samples from feed oils used for dust prevention? (updated on 07.10.2019)**

Refined oil can't be tested on GMO. Therefore, the farmer or operator of grinding and mixing facilities does not need to take (retention) samples.

**74 ] Does the sampling permission (C 6.4.1; E 4.8.1.1) have to be present at the farm or is it sufficient if it is available at the company of the facility operator? (19.02.2020)**

It is not necessary to have the permission (or a copy) available on the farm. The permission will be checked by the auditor of the facility during its audit.

In special cases, the certification body of the farmer can demand for the permission to be handed in by the farmer (e.g. sent in after the audit). This should only be done to spot-check or in case of problems/suspicion.

## Animal Transport and Livestock Trade

**75 ]** In which cases does the trader of VLOG livestock not have to be VLOG certified? (asked on 13 April 2018)

Livestock trade does not need to be VLOG-certified for the following:

- Livestock for which the minimum conversion feeding period has not yet started (e.g. calves, young cattle for milk production)
- Animals that will not be marketed as "VLOG"

**76 ]** An agricultural operation has already been audited and certified pursuant to the VLOG Standard. If the operation purchases a cow from a farmer today which is proven to have been fed GMO-free for 3/4 of its life, can the operation sell it to a slaughter house the next day (or even on the same day) in VLOG quality? (updated on 28.10.2019)

In this case, the requirements in 20.01 of the VLOG Standard differ depending on the respective stage of the buyer.

### 1. Animal-based Production (Chapter E 4.6):

This includes animals for food production and, according to the Standard. Until 31.12.2019 there is the possibility that VLOG-compliant feeding at the (non-VLOG-certified) previous owner can be taken into consideration if the previous owner fills in the confirmation in [Annex II](#) of the VLOG Standard.

### 2. Livestock trade (Chapter E 6.1):

For the previous owner, proof of VLOG certification or the integration in a VLOG group certification for the Animal Scope of Applicability (e.g. cattle) must be provided if the "ohne Gentechnik" conform feeding may be taken into account.

### 3. Food (Chapter G 3.5):

When accepting animals, a VLOG or [equivalent certification](#) must be provided.

So, if a farmer purchases an animal for the purpose of actual facility production (e.g. purchase of breeding animals, dairy cows on a dairy farm), then VLOG-compliant feeding by the previous owner can be taken into account until 31.12.2019 even if he is not certified.

If the animal is purchased for the purpose of trade (this is assumed in this case due to the short time at the agricultural operator), then the animal must come from a VLOG-certified agricultural operation in the animal sector (here: cattle). Taking into account VLOG-compliant feeding by a non-VLOG-certified supplier is not possible in this case.

**77 ]** Is it possible to adapt the VLOG-audit interval of animal transport and livestock trade to the QS-audit interval after the VLOG certificate was issued? (10.12.2019)

By Version 20.01 of the VLOG standard it is possible for animal transport and livestock trade to adapt the VLOG audit interval to the audit interval of QS. The preconditions and further information can be found in chapter C 2.2. Upon request, the validity period can be extended even after the issuance of the certificate by the certification body if the requirements are fulfilled.

## Analysis and Sampling

### General

#### 78 ] Which feed, raw material and products can be tested on GMO? (14.03.2018)

The [VLOG Assessment Aid for Suitability of Testing for GMO](#) provides an overview of feed, raw materials and products that can be tested on GMO or not. The responsible analysis laboratory is also consulted about the analysability of feed and raw materials.

#### 79 ] May a certificate be awarded if there are positive GMO analysis results in a business and it has been found that the feed or raw materials in question had already been delivered before the analysis results were available? (14.03.2018)

First it must be taken into consideration which measures the business has introduced following the positive analysis results (Were there direct and long-term measures? Evaluation of the analysis results and assessment of the process?). If no concrete and effective measures were taken, that would be a reason not to issue a certificate. Corrective measures must be taken and their efficiency must be proven through analyses. If necessary for the evaluation of corrective measures, a follow-up audit has to be carried out by the certification body.

### Feed

#### 80 ] May the feed supplier provide the reference samples – which is required for risk-prone feed – directly together with the supplied feed (e.g. in the event that the farmer is not present for the delivery)? (updated on 02.11.2018)

It is not required for the supplier and the client to take a sample of the feed together. So, it is possible for the deliverer to provide the reference sample. Please note, that in this case the farmer takes the responsibility for the process and has to decide if he wants to relinquish the security of a joint sampling.

#### 81 ] May feed analyses conducted by the feed supplier be taken into account by the customer? (updated on 02.11.2018)

The analyses conducted by companies that are certified against VLOG or a standard recognised as equivalent to VLOG may be taken into account by the customer. This is possible, if the samples were taken from the specific batch delivered to the customer and if they have been analysed according to the requirements of the VLOG-standard.

#### 82 ] If a GMO-amount between 0.1% and 0,9% is detected in feed, the supplier has to be informed about this result. Annex V demands the supplier to give out a statement that confirms that the feed is not object to mandatory labelling according to EC regulations 1829/2003 and 1830/2003. Is it possible to waive this statement? (19.02.2020)

If the supplier was informed in writing about the test result, an additional statement can be waived.

When giving out the information, it is recommended to explicitly ask the supplier to give feedback if it should turn out that the feed is subject to labelling requirements. For example, the following wording can be used: "If it should turn out that this is a contamination requiring labelling in accordance with EC Regulations 1829/2003 and 1830/2003, please inform us immediately".

## Food

**83 ]** What does the required annual number of analyses in the incoming goods relate to on the stage Food Processing/Preparation? (14.03.2018)

The number of samples in chapter G 4 (between 2 and 12 per year) relates to the whole amount of raw material used in the VLOG-production.

**84 ]** A processing facility that produces "VLOG" cheese, is put into risk category 2. As a consequence, 12 analyses per year are necessary according to chapter G 4. The risk assessment reveals, that the paprika extract used in the cheese is the only at-risk raw material that can be tested on GMO. Does the paprika extract have to be analysed 12 times per year in this case? (updated on 04.10.2019)

The business has to distribute the 12 analyses among all at-risk raw material that can be tested on GMO. If this only concerns the paprika extract, this is the only material, that has to be analysed.

The number of samples can only be reduced, if the number of batches received in the audit period is smaller than the minimum number of samples of 12 (e.g. 5 batches, that lead to 5 analyses).

Additionally, sampling and GMO-testing can be reduced if the raw material and products are not at-risk. In this case a risk assessment according to chapter G 4.1.1 has to be created.

## Certification Bodies and Auditors

**85 ] Which certification bodies may be commissioned with VLOG certification? (14.03.2018)**

Only certification bodies approved by VLOG may issue certificates according to the VLOG Standard. All certification bodies approved by VLOG are listed [here](#).

## Qualification of Auditors

**86 ] May an auditor carry out VLOG audits before participating in a official VLOG training? (14.03.2018)**

Nein, bevor VLOG-Audits durchgeführt werden können, ist die VLOG-Schulung zu absolvieren. Es ist nicht zwingend notwendig, die Ausstellung des Schulungszertifikats abzuwarten, aber die Schulung muss erfolgreich besucht worden sein.

## Performing and Evaluation of the Audit

### Performing the Audit

#### 87 ] Does each site of a business have to be audited separately? (updated on 02.11.2018)

Each site that is relevant for the VLOG production must be audited. I.e. every site through which "VLOG" food/ "VLOG geprüft/verified" feed pass and on which activities that require VLOG-certification take place.

#### 88 ] What are the procedures if the business to be certified has not concluded a Standard Usage Agreement? (14.03.2018)

In general, it must be checked during the audit whether a Standard Usage Agreement has been concluded with VLOG. If this is not the case, this must be remedied by concluding an agreement and submitting it to the certification body before the certificate can be issued.

#### 89 ] Is a traceability test required during the certification audit? (14.03.2018)

No, such a test is not mandatory. However, many auditors carry out such a test because this is a way of checking the requirements for product tracking in the business. If a traceability test or complete quantitative balancing is too time-consuming, the auditor also alternatively decide to conduct a spot-check test.

### Evaluation of the Audit

#### 90 ] What is the correct procedure, if one of the sites of a multi-site company gets a KO (knock-out) -grading?

It has to be assessed if the problem is site-specific or systematic for the whole company. In case of a systematic problem (for example in the risk management), the KO can influence the certification of other sites and lead to a KO for the whole company.

#### 91 ] What happens when a business has already been successfully certified but the certificate has not yet been submitted? Is the certificate already considered submitted provisionally until the official documents has been issued and sent to the business? (14.03.2018)

"Ohne Gentechnik" and/or "VLOG-geprüft" production may start once VLOG receives a written confirmation from the certification body indicating that, based on the audit result, a certificate can be issued but has not been issued yet for other reasons.

### Corrective Action and Sanctions

#### 92 ] Are there any deadlines to be met with respect to implementing corrective actions or issuing a certificate? (updated on 01.11.2019)

Corrective actions and deadlines must be presented by the audited business within 4 weeks after the audit and are to be approved by the competent certification body.

Deadlines for the fulfillment of corrective actions, have to be coordinated between certification body and company and at latest until the next inspection.

In case of safety-relevant corrections, the certificate will only be issued after the corrective actions have been implemented.

## Audit Documents and Certificates

### Certificate

**93 ]** If a company has several production sites does the certification body issue one certificate for the whole company or individual certificates for the specific sites? (updated on 04.10.2019)

Both methods are possible. On the one hand, one certificate can be issued for the whole company (including the VLOG-ID of the company and all sites with their Sub-IDs). On the other hand each site can get its own certificate (including name of the company with general VLOG-ID and the specific site with its Sub-ID).

**94 ]** Instead of containing the scope of application (e.g. "compound feed" or "sliced cheese"), may the product-specific information be mentioned on the certificate (e.g. brand name of the feed/food)? (14.03.2018)

Product-specific information may be added to the certificate in the form of an annex to the certificate. However, on the VLOG certificate, it is only possible to provide the information about the scope of applicability with reference to the annex.

**95 ]** Does a business have to be a member or seal user in order to issue a VLOG certificate? (14.03.2018)

No. Membership is required only to have a right to vote in the VLOG association; a licence is the prerequisite for the use of the seal. At present, neither is obligatory in order to be certified according to the "Ohne Gentechnik" Production and Certification Standard.

### Facility Description

**96 ]** Does the VLOG Facility Description have to be signed on every page? (19.12.2019)

The signature of the company is sufficient on the last page of the facility description.

The auditor has to sign every page. Anyway, the signature on the last page can be sufficient, if the facility description is scanned, photographed or copied after the audit and retained by the certification body. In this case, the missing signatures on the preceding pages do not present a problem, because the audited version can be checked retrospective changes can be identified afterwards.

**97 ]** If a new version of the facility description is published, does the current, filled out version get invalid or can it be used further on? (19.12.2019)

If there are no substantial differences between the current and the new version, the current version can be used further on.

If there are substantial differences between the current and the new version, either a new version has to be filled out or the differences/additions have to be added to the current version. In doing so, the comprehensibility and clarity have to be hold up.

## Use of the Seal

### General

#### 98 ] How long does it take VLOG to award the licence for the “Ohne Gentechnik” or “VLOG geprüft” when the audit was passed? (updated on 19.12.2019)

A business that wishes to use the “Ohne GenTechnik” or “VLOG geprüft” seal may start the process of applying for use of the seal in the course of the certification process. As soon as the VLOG-certification or a certification according to a [standard recognised as equivalent](#) was passed (confirmed by a valid certificate), the application for use of the seal can be submitted to VLOG. The awarding of the licence normally takes two to four weeks, depending on the extent of the check. This is, if all other required documents/information (e.g. licence agreement, scope of application) were submitted to VLOG completely. In urgent cases it can be possible to shorten the duration of the process.

#### 99 ] What are the costs associated with using the seal? (14.03.2018)

For the use of the protected "Ohne GenTechnik" or "VLOG geprüft" trademark, an annual licence fee is to be paid to VLOG. For food, the annual fee is calculated based on the turnover of the products labelled with the “Ohne Gentechnik” seal. For “VLOG geprüft“ feed the annual fee is based on the total turnover of the company. Detailed information regarding the fee amount is available in the current [VLOG Licence Fee Schedule "Ohne GenTechnik" Seal](#) and [VLOG fee schedule for licences for the “VLOG geprüft” Seal](#).

Costs that are associated with certification pursuant to the VLOG Standard are to be paid exclusively to the certification body and not to VLOG.

#### 100 ] Are there any other fees beside the licence fee that the business needs to pay directly to VLOG? (14.03.2018)

If the facility does not wish to become a VLOG member and does not apply for a license for use of the "Ohne GenTechnik" or "VLOG geprüft" seal, there are no other fees to be paid to VLOG.

#### 101 ] What happens in the event of a violation of the requirements of the “Ohne GenTechnik” or “VLOG geprüft” seal use? (14.03.2018)

That is a discretionary decision on the part of VLOG. In the event of a serious breach, VLOG may revoke the usage permission for the seal and define further sanctions. This is based on the sub-licensing agreement for use of the "Ohne GenTechnik" seal or the licence agreement for the "VLOG geprüft" seal concluded between VLOG and the user of the licensee.

### Labelling with the seal

#### 102 ] May the "Ohne GenTechnik" seal or the "VLOG geprüft" seal be used on delivery slips or other documents? (14.03.2018)

The "Ohne GenTechnik" seal or "VLOG geprüft" seal may be used on delivery slips or internal business documents if the business has concluded a (Sub) Licence Agreement with VLOG.

## International Use of the Seal

### 103 ] May the “Ohne GenTechnik” seal also be used on products that are placed on the market outside of Germany? (19.12.2019)

To use the German, or a translated version, of the “Ohne GenTechnik” seal, the requirements of the VLOG Standard must be met along with those pursuant to the national law of the country where the product is being placed on the market. Assessing the legality of using the “Ohne GenTechnik” seal outside of Germany is the sole responsibility of the licensee.

A suitable translation of the “Ohne GenTechnik” seal may be requested from VLOG by contacting [layout@ohnegentechnik.org](mailto:layout@ohnegentechnik.org). It is not permitted to develop one's own translated version. Products may only be placed on the market with a translated version of the seal following conclusion of a sub-licensing agreement between the licensee and VLOG. If such an agreement already exists, it must be supplemented with any new products that are to be labelled.

### 104 ] May the “VLOG geprüft” seal also be used on products that are placed on the market outside of Germany? (19.12.2019)

The “VLOG geprüft” seal may also be used on feed that is placed on the market outside of Germany. Beside the German version of the seal, there is also an English version available: “VLOG verified”. No other translations are permitted.

## „Ohne GenTechnik“ Seal

### General

#### 105 ] What is the "Ohne GenTechnik" seal?(14.03.2018)

The "Ohne GenTechnik" seal is a trademark-protected word and figurative mark, which is owned by the Federal Republic of Germany, legally represented by BMEL. On the basis of an exclusive agreement with the Federal Ministry of Nutrition and Agriculture, solely VLOG is authorised to issue usage rights for the “Ohne GenTechnik” seal. The specific usage is governed by an agreement between each licensee and VLOG. The basis for this agreement is certification of compliance with the VLOG standard or a [standard recognised as equivalent](#).

Food with this label may not be genetically modified organisms (GMOs) itself, nor contain or be produced from GMOs. No components produced by GMOs may be used during the production either.

For food of animal origin such as meat, milk or eggs and for food that contains products from animal origin, the following also applies: They may only be labelled as "Ohne Gentechnik" if the animals themselves were not fed with genetically-modified feed within defined periods.

#### 106 ] Why is “Ohne Gentechnik” labelling important?(14.03.2018)

Milk, eggs and meat need not be labelled, even if the animals have eaten genetically modified plants. However, most genetically modified plants are globally used to produce animal feed.

By means of the “Ohne Gentechnik” label, manufacturers can point out to the customer that they have refrained from using genetically modified plants in the food itself and in animal feed. Thus, consumers have the possibility of standing up for GMO-free agriculture by their buying behaviour.

**107 ] Wouldn't it be preferable to have a “Mit Gentechnik” (“with GMO”) seal instead of a “Ohne GenTechnik” (“without GMO”) seal? (14.03.2018)**

VLOG endorses an extension of the EU labelling regulations for genetically modified food. The most important reason why Germany has a “Ohne Gentechnik” label is because the EU “Mit Gentechnik” labelling has large gaps. For example, milk, eggs and meat need not be labelled in the EU as being genetically modified, even if the animals have eaten genetically modified plants. At present, there is no majority in Brussels supporting a change of this law. Even if the mood should change in the EU Commission, it will take years before a new law will enter into force. Until an extended “Mit Gentechnik” labelling becomes obligatory, the voluntary “Ohne Gentechnik” labelling is a sensible alternative for consumers.

**108 ] What do consumer organisations, environmental associations and organic food producers think of the “Ohne Gentechnik” labelling? (14.03.2018)**

Consumer organisations appreciate the freedom of choice of consumers. As result of the "ohne Gentechnik" labelling the consumers can finally choose whether they want to support the cultivation of genetically modified plants or not. There is great hope for a boom of “Ohne Gentechnik” products and a decrease of the cultivation of genetically modified plants if the population, with a majority that rejects genetic engineering, purchases correspondingly.

The environmental associations welcome this labelling for the same reason. Above all, they see the threat to biodiversity and ecosystems which results from the cultivation of genetically modified plants.

The organic food industry considers the labelling opportunity to be a progress as well: Genetic engineering is never used to produce organic products. The fewer genetically modified plants are cultivated, the lesser the risk for contamination is. The expense for testing and safety measures would decrease.

## Products which can be labelled with the Seal

**109 ] What products may the "Ohne GenTechnik"- seal be used on? (14.03.2018)**

The seal may be used on all products the business has received a usage license for from VLOG.

Generally, the "Ohne Gentechnik" labelling is intended for all plant and animal-based food, if using genetic engineering in the production is possible or assumed by the customer.

For example, because of general competition laws, using the seal on natural mineral water is not allowed because genetic engineering is generally not used for it. However, it could be placed on a label for mineral water with specific fruit ingredients (e.g. papaya) since genetically-modified papaya is available on the market.

However, it is more common, for example, for chocolate which may contain soy lecithin or for food in which soy derivatives are part of the recipe. The same goes for your frozen pizza and cereal. However, food from animal origin is particularly important: from dairy products, eggs and poultry sausage to roast pork and steak. When producing these foods, usually genetically modified plants are used. Thus success can be best achieved and communicated here.

**110 ]** May food produced from plants for which there is currently no GMO cultivation worldwide (e.g. sunflower oil) be labelled as “Ohne Gentechnik” or would that be “self-evident advertising”? (14.03.2018)

In the processing sector (here: oil mills/refineries) the impurities/contamination can occur. Rapeseed/canola oil that was (partially) produced from genetically modified rapeseed/canola or is contaminated by genetically modified rapeseed/canola, for example, is a critical raw material that could lead to a contamination of “Ohne Gentechnik” sunflower oil.

Due to the risk of contamination, VLOG does not consider advertising such food (e.g. sunflower oil) as “Ohne Gentechnik” as “self-evident advertising”.

**111 ]** Can individual products on a compound food be marked as "Ohne Gentechnik"? (14.03.2018)

No. The "Ohne Gentechnik" label always has to refer to the entire product.

## Application for the Seal

**112 ]** What requirements does a business have to fulfil for use of the seal? (14.03.2018)

In general, any business that meets the statutory prerequisites can label its products with the words "Ohne Gentechnik".

For this purpose, the businesses shall present prima facie evidence that their products meet the statutory prerequisites under Sect. 3a and Sect. 3b of the EGGenTDurchfG. The requirements vary by industry and product. The current ["Ohne Gentechnik" Production and Certification Standard](#) includes all requirements that must be fulfilled for the respective sector/stage.

**113 ]** Who may use the "Ohne GenTechnik" seal? (14.03.2018)

The "Ohne GenTechnik" seal may be used exclusively by the business that has concluded a Sub-licence Agreement with VLOG for use of the "Ohne GenTechnik" seal.

**114 ]** Who has to apply for the use of the "Ohne GenTechnik" seal? (14.03.2018)

Each product, that shall be advertised for with the "Ohne GenTechnik" seal requires a licence.

The sub- licensee, i.e. the business that needs to apply for the licence for use of the seal, is clearly defined by VLOG:

“A sub- licensee for the VLOG ‘Ohne GenTechnik’ seal has to be the distributor of a food product who, within the scope of its activities, applies the VLOG seal to its products. Generally, it is the manufacturer of the food product. In individual cases, it could also be the company that fills, slices or portions and then packages the food product.”

## „VLOG geprüft“ Seal

**115 ]** What is the "VLOG geprüft"/"VLOG verified" seal? (14.03.2018)

The “VLOG geprüft“ seal is a trademark-protected word/image logo whose owner is the Verband Lebensmittel ohne Gentechnik e.V. (VLOG).

It serves the purpose of labelling feed that is suitable for producing food labelled as "Ohne Gentechnik". The feed is certified pursuant to the VLOG Standard or a [standard recognised as equivalent](#) by VLOG.

**116 ] What are the advantages of using the "VLOG geprüft" seal? (14.03.2018)**

The "VLOG geprüft" label allows producers, merchants or suppliers to advertise that their feed has been inspected pursuant to the VLOG "Ohne Gentechnik" Production and Certification Standard or a [standard recognised as equivalent](#).

**117 ] Who may use the "VLOG geprüft" seal? (14.03.2018)**

The "VLOG geprüft" seal may be used exclusively by the business that has concluded a Licence Agreement with VLOG for use of the "VLOG geprüft" seal.

**118 ] Who has to apply for the use of the "VLOG geprüft" seal? (updated on 28.10.2019)**

Each company that wishes to advertise feed with the "VLOG geprüft" seal or wants to use it on bills of lading or other documents requires a licence.

If bagged feed shall be labelled with the "VLOG geprüft" seal, normally the producer acts as licensee but also a company that trades or does private labelling can be the licensee for products produced for it. In this case the license just includes products, which are traded by the licensee.

## Organic and VLOG

**119 ] Does organic feed require certification pursuant to the VLOG Standard for it to be used in the production of "ohne Gentechnik" food? (updated on 02.11.2018)**

Certified organic feed is considered as equivalent to "VLOG geprüft/varified" feed and is therefore suitable for the production of "VLOG"/"ohne Gentechnik" food. If the feed is to be labelled with the "VLOG geprüft/varified" seal, no additional VLOG certification is necessary on top of the organic certification. However, the feed business has to apply to VLOG for a licence for the use of the "VLOG geprüft/varified" seal.

**120 ] Is organic certification recognised as equivalent to a VLOG certification for processed animal products (e.g. spiced ham)?**

Whether or not organic certification may be considered as equivalent to VLOG certification depends on the additional ingredients that are used. During the production of spiced ham, ingredients are used for which the requirements of the EGGenTDurchfG go beyond those of Regulation (EC) No. 834/2007 on organic production and labelling of organic products (e.g. dextrose, spices). Organic certification is not sufficient in this case. In this document we explain in which cases further requirements have to be fulfilled for the recognition of the product as equivalent.

**121 ] May all organic food be labelled with the "Ohne GenTechnik" seal? (updated on 04.10.2019)**

Genetically modified plants are prohibited in organic farming. Nevertheless, not all organic products may be labelled as "Ohne Gentechnik". Two issues are to be taken into account: thresholds for food ingredients and self-evident advertising.

**Thresholds for food ingredients:** According to the law, the same threshold for contamination with genetically modified components applies for ingredients in the organic sector and for conventional food: 0.9% per ingredient if contamination was adventitious or technically unavoidable. However, for "Ohne Gentechnik" products, the legislator expects a purity up to the detection limit of, in most cases, 0.1%. That means that organic producers must provide additional VLOG GMO-free certificates for their plant-based food ingredients.

**Self-evident advertising:** Since the requirements for organic and "Ohne Gentechnik" food ingredients are different, correctly implemented "Ohne Gentechnik" labeling for organic food of plant origin or plant ingredients must also not be self-evident. It could be different for products of animal origin such as milk, eggs and meat to which no ingredients of animal origin were added. The requirements for feed for the production of "Ohne Gentechnik" food do not go beyond the requirements in the organic sector. But here as well, in VLOG's opinion, it may be sensible and legal to label an organic food item with the "Ohne GenTechnik" seal. For this purpose, however, the security concepts for guaranteeing it is GMO-free, which go beyond the requirements of the production of organic foods, should be implemented. Furthermore, there are longer conversion periods for some animal species (e.g. cattle for beef, aquaculture). Additionally, it may be argued that many consumers are not aware that organic food are produced without genetic engineering. In this respect, the "Ohne GenTechnik" seal has an informative content and, from the view of the consumers, does not convey any self-evident fact.

For more in-depth legal advice, we suggest that you contact a law firm. In the "Links" column you will find contact information for law firms that have dealt in detail with "Ohne Gentechnik" labelling.

## Membership

### 122 ] Who can become a member of the Verband Lebensmittel ohne Gentechnik (VLOG)? (14.03.2018)

In general, any consumer or business can become a VLOG member. The purpose of the association is to inform consumers on the subject of food without genetic engineering within the meaning of consumer protection. The members have to support this.

Our members are farmers processors, marketers, food producers and trade businesses as well as advisors, associations and individuals.

### 123 ] What are the advantages of a VLOG membership? (14.03.2018)

The more members VLOG has, the more important its position does get in politics, economics and the media. With your membership, we can engage ourselves even better for GMO-free food production.

As a member, you will regularly receive an electronic newsletter with news from the association and articles about current GMO topics. You may participate in the General Assembly (GA), the highest decision-making body of the association, and help determine the future of VLOG. Every second year, the GA elects its executive board.

You may also participate in various work groups. We are happy to give you expert advice on "Ohne Gentechnik" production and support you in handling questions from consumers and the media.

### 124 ] How much does the membership cost? (14.03.2018)

Membership fees are staggered based on branches and annual revenue and start at 30€ per year for individuals. The fee schedule gives detailed information.

### 125 ] Do VLOG members automatically have the right to put the "Ohne GenTechnik" seal or "VLOG geprüft" seal on their products? (14.03.2018)

Membership and use of the seal are not linked. A licensee for the "Ohne GenTechnik" or "VLOG geprüft" seal does not have to be a VLOG member. On the contrary, not every member may use the seal. Nevertheless, most licensees are also VLOG members.

The uniform seal promises maximum recognition by the consumer and, as a member, you profit from VLOG's strong and expert representation of your interests. Das einheitliche Siegel verspricht die größte Wiedererkennung beim Verbraucher, und als Mitglied haben Sie mit dem VLOG eine engagierte und fachkundige Interessenvertretung.