"Ohne Gentechnik"
Production and Certification Standard

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Verband Lebensmittel ohne Gentechnik e.V.

[German Association Food without Genetic Engineering]

www.ohnegentechnik.org

Language: Original documents are in German. This is the official VLOG-version in English language. In case of discrepancy between translations, the German version shall prevail.

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Part A: General

A 1. Introduction

The EC Genetic Engineering Implementation Act (EGGenTDurchfG) has been in force since May 2008. It governs the labelling of food which has been produced without the "use of genetic engineering processes". To indicate that a food product advertised or distributed on the German market was produced without the use of genetic engineering, the designation “Ohne Gentechnik” may be used exclusively.

A 1.1 Purpose of the Standard

The present Standard is destined for

- Producers, processors and traders of food who wish to label their products with an “Ohne Gentechnik” seal or the designation “Ohne Gentechnik”.
- Producers and traders of feed who wish to label their products with the “VLOG geprüft” seal.

Moreover, in addition to agricultural operations and logistics businesses, food producers and processors, as well as feed producers and traders may be certified according to the Standard, regardless of the aforementioned desire for labelling their products (VLOG seal).

The present Standard serves as the basis for issuance by VLOG of a licence to use the “Ohne Gentechnik” and “VLOG geprüft” seal. Moreover, it may aid businesses in developing a self-monitoring system.

A 1.2 VLOG as Standard-Issuing Body

The legal basis for the “Ohne Gentechnik” label is the EC Genetic Engineering Implementation Act (EGGenTDurchfG). In response to the desire of interested businesses and associations for improved recognition of food without GMO, the German federal government developed the unitary “Ohne GenTechnik” seal.

Since the federal government did not want to issue the usage licenses itself and instead decided to have them issued by a food sector association, on 23 March 2010, a working group of interested companies formally established the German Association Food without Genetic Engineering (VLOG) from among its members. [VLOG is legally registered in the Associations Register at the Municipal Court of Berlin-Charlottenburg.]

VLOG represents the interests of its members *vis-a-vis* regulators, government, media, society at large and also other market participants. Its members include, among others, farmers, food and feed producers, certification bodies, laboratories and food retailers.

A 1.2.1 Use of the “Ohne GenTechnik” Seal

Since August 2009 food may be labelled with the nationwide “Ohne GenTechnik” seal (see Figure 1: Official "Ohne GenTechnik" seal) which is a registered trademark owned by the German Federal Government. 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. Therefore, the use of the “Ohne GenTechnik” seal for labelling and advertising food as well as for the use on certificates is only permissible with the approval of VLOG. The specific usage is governed by an agreement

between each licensee and VLOG. The basis for this agreement is certification of compliance with the present Standard or a standard recognised as its equivalent.

(http://www.ohnegentechnik.org/)

Figure 1: Official "Ohne GenTechnik" seal

Use of the "Ohne GenTechnik" seal outside of Germany

To use the German, or a translated version, of the "Ohne GenTechnik" seal, the requirements of the VLOG Standard must be met, as must 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. It is not permitted to develop one's own translated version. Products may be placed on the market with a translated version of the seal only 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.

A 1.2.2 Use of the "VLOG geprüft" Seal for Feedstuffs

In order to explicitly point out on the package and/or the bill of lading accompanying a feed shipment, the absence of the obligation to label the product in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003, and thus their suitability for "Ohne GenTechnik" food production, the trademarked "VLOG geprüft" seal (see Figure 2) may be used. The use of the "VLOG geprüft" seal is only permissible with the consent of VLOG as the proprietor of the trademark, and is regulated by a separate agreement between VLOG and the business placing the product in the market. The basis for this agreement is a certification of compliance with the present Standard or a standard recognised as its equivalent.

(http://www.ohnegentechnik.org/)

Figure 2: Official seal for feed certified in accordance with the VLOG "Ohne Gentechnik" Standard

A 1.3 Legal Basis & Interpretation

The following legal regulations and interpretations constitute the basis of the present Standard. The current versions of the relevant legal regulations are binding.

- EC Genetic Engineering Implementation Act (Gesetz zur Durchführung der Verordnungen der Europäischen Gemeinschaft auf dem Gebiet der Gentechnik und über die Kennzeichnung ohne Anwendung gentechnischer Verfahren hergestellter Lebensmittel, EG-Gentechnik-Durchführungs-gesetz, abbreviated EGGenTDurchfG), dated 22 June 2004 (Federal Law Gazette I p. 1244, as last amended by Article 58 of Regulation of 31 August 2015, Federal Law Gazette I p. 1474).
- Regulation (EC) No. 1829/2003 concerning genetically modified food and feed, dated 22 September 2003
- Regulation (EC) No. 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms, dated 22 September 2003 and the amendment to Directive 2001/18/EC
- Regulation (EC) No. 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down the procedures in matters of food safety, Article 18 1, dated 28 January 2002
- Regulation (EC) No. 619/2011 laying down the methods of sampling and testing for the official control of feed for genetically modified material for which an approval procedure is pending or the approval of which has expired, dated 24 June 2011
- Regulation (EC) No. 834/2007 of the European Council on organic production and labelling of organic products and repealing Regulation (EEC) No. 2092/91, dated 28 June 2007
- Regulation (EC) No. 152/2009 of the European Commission laying down the methods for sampling and analyses for the official testing of feed, dated 27 January 2009
- Guidelines for controlling GMOs in feed – monitoring of the production, handling, use and placing on the market of feed in connection with genetically modified organisms, dated November 2011 (developed by the GMOs in Feed Project Group (PG GVO) of the Agricultural Employers Association (LAV) Working Group on Feed, with the participation of the Federal Government and The Association of German Agricultural Investigation and Research Institutions (VDLUFA), especially Chapter 5 as well as Annexes 1 and 2
- Guidelines for controlling genetic modifications in food products – orientation framework for applying the legal regulations and for controlling genetic modifications in food products of 29 March 2017 (developed by the ALS working group Monitoring of GMO Food Products)
- Additional interpretations of the legal regulations by the VLOG managing office may be found at: http://www.ohnegentechnik.org/downloads/

A 1.3.1 Regulations (EC) No. 1829/2003 and 1830/2003

A basic requirement regarding feed and food ingredients for the production of food labelled “Ohne Gentechnik” is that they be exempt from labelling according to the requirements of Regulations (EC) No. 1829/2003 and No. 1830/2003.

Contamination with GMOs permitted in the EU by law has no impact on labelling obligations according to Regulations (EC) No. 1829/2003 and No. 1830/2003 provided that two requirements are fulfilled:

- The threshold value of the GMO content of 0.9% per single-component feed/ingredient (feed/food) is not exceeded and
- The presence of the GMO content is “adventitious or technically unavoidable”.

Contamination with approved GMO content < 0.1% are generally considered as “technically unavoidable” or “adventitious”.

Contamination present in a magnitude of > 0.1% and ≤ 0.9% is considered as labelling-compliant if the business has installed and demonstrably implemented organisational measures to avoid introduction of GMO material.

Assistance for labelling feed

To determine as of what level feed is subject to compulsory labelling within the meaning of Regulations (EC) No. 1829/2003 and 1830/2003, please consult in particular Part 5 and Annexes 1 and 2 of the “Guideline on controlling GMOs in feed” (http://www.ohnegentechnik.org/Leitfaden_Futtermittel).

With regard to Example 4.b 1 in Annex 1 of the abovementioned Guideline, it is explicitly noted that the waiver of the GMO marking relates only to botanical contamination of a single-component feed. Carryover of GMO material during the production process in a feed plant may not be considered as botanical contamination with the resulting labelling options.

A 1.3.2 EC Genetic Engineering Implementation Act (EGGenTDurchfG)

Any company that meets the statutory prerequisites may label its products in Germany with the words “Ohne Gentechnik”. In this case, Secs. 3a and Sec. 3b of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) apply. If, however, it is intended to use the unitary “Ohne GenTechnik” seal (Figure 1: Official “Ohne GenTechnik” seal), an application in this regard must be submitted to VLOG in advance (see Chapter A 1.2.1)

For food ingredients to qualify for the “Ohne GenTechnik” seal, the requirements go clearly beyond the absence of a labelling obligation according to Regulations (EC) No. 1829/2003 and No. 1830/2003.

According to EGGenTDurchfG, no GMOs may be used in the production of food, ingredients and additives, which may not contain or be produced from GMOs. In general, adventitious or technically unavoidable traces of genetically modified material are tolerated up to a threshold of at most 0.1% per ingredient. Processing aids may not be produced from GMOs.

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. Currently, no substances are listed.

Feed for use in the “Ohne Gentechnik” system must not be subject to compulsory labelling pursuant to Regulation (EC) No. 1829/2003 or 1830/2003. Suitable steps must be demonstrably taken to prevent the presence of GMOs (see “Guidelines on controlling GMOs in feed”). Feed additives must be taken into consideration only if they are made from GMOs or GMO components and therefore must be labelled themselves. According to the existing legal provisions, any feed additives that are produced using (or with the help of) GMOs need not be labelled and may be used without restrictions.

A 1.4 Additional Requirements of the VLOG Standard for Processing Aids and other Substances

For the production/processing of "Ohne Gentechnik" products, no processing aids or other substances within the meaning of Sec. 3 Par. 5 of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) may be used which contain, consist of, or are produced from GMOs labelled in accordance with Regulation (EC) 1829/2003 or 1830/2003, or which would have to be so labelled were they placed into circulation.

A 2. Scope of Applicability of the Standard

The present Standard forms the basis for certification according to VLOG certification for the Feed, Raw Materials and Food Stages along with associated services and activities in the EU. The VLOG Standard is based on the labelling provisions of Regulations (EC) 1829/2003 and 1830/2003 and therefore may not be applied on a 1:1 basis outside of the EU. For use of the VLOG Standard outside the EU, the business or certification body must apply to VLOG for permission before auditing and certification.

A 2.1 Definition of Stages in the Standard

The stages and sub-stages in the production chain for which the VLOG Standard lays down requirements are defined below. The regulations regarding the certification obligation may be found at the beginning of Parts B to G of the Standard.

If a business is applying for certification according to the VLOG Standard for activities on multiple stages and/or sub-stages, all the requirements for the respective stages/sub-stages must be checked by the auditor.

Definition of stages, including the relevant parts of the Standard:

- Logistics (Part B)
  - Transport
  - Storage, handling
  - Trading, drop shipping
- Feed (Part C)
  - Feed manufacturing, processing
  - Transport
  - Storage, handling
  - Trade
  - Mobile grinding and compounding facilities
- Agriculture (Part D)
  - Animal production
  - Plant-based production
  - Animal transport, livestock trade
- Group Organisation (Part E)

- Food (Part F)
  - Processing
  - Transport
  - Trade
- Retail – Sale of bulk foodstuffs of animal Origin (Part G)

A 3. Certification Types and Certification Process

A 3.1 Audit Types

The VLOG Standard differentiates amongst the following audit types which are valid for all stages:

Initial audit:

During the initial audit, a company will be audited one first time in accordance with the "Ohne Gentechnik" Production and Certification Standard. It is a full on-site audit of all sites/business units involved in "Ohne Gentechnik"/ "VLOG geprüft" activities of a business. The auditor must assess all applicable requirements of the Standard and/or the established stages. The initial audit forms the basis for the initial certification of the business, provided all requirements are met.

The time of the audit is to be determined jointly by the business and certification body, taking the following into account:

- Stages of Logistics, Feed, Food, Sale of bulk foodstuffs of animal origin:
  The audit is to take place during production but not necessarily during the production of "Ohne Gentechnik" and/or "VLOG geprüft" products. In the case of seasonal production, the initial audit is to be carried out during the production season.
- Agriculture Stage:
  The audit is to be carried out after conversion to feeding with feed not subject to compulsory labelling.

<u>Reduced initial audit for feed producers and/or feed logistics providers:</u>

If the company is certified according to a recognised quality assurance standard such as QS, KAT or GMP+, initial certification may be awarded on the basis of a reduced initial VLOG audit. This is possible if the routine audit according to the quality assurance standard was carried out and passed within the last 6 months, at most. In the reduced initial VLOG audit, only those requirements related to genetic engineering audit points will be assessed. Unassessed requirements will be marked as such in the VLOG checklist and reference will be made to the items and results of the routine quality assurance audit. The report from the routine audit according to the other quality assurance standard will be sent to VLOG along with the VLOG certification documents.

Expansion audit:

If, during the validity period of the certificate, the company wants to include new product groups, processes, production lines, etc. within the scope of their certification, this is to be assessed within the framework of an expansion audit.

Whether a full audit must be performed or only specific requirements checked will be determined by the relevant certification body.

If the requirements are met, the VLOG certificate will be amended to include the new product groups. If no complete on-site audit is performed, the amended certificate will expire at the same time as the certificate for the previous routine audit.

Follow-up audit:

Follow-up audits serve to assess the implementation and effectiveness of corrective actions at the audited business. The auditor will only evaluate specific requirements of the VLOG Standard on-site. If the follow-up audit has been announced beforehand, the certification body must document the reason for the announcement of the audit. The certification body is to select the timing of the follow-up audit such that the efficacy of the specified measures can be reviewed.

Routine audit (to renew certification):

The routine audit is a full on-site audit of all sites/business units involved in "Ohne Gentechnik"/ "VLOG geprüft" activities of the business. All requirements of the present Standard will be assessed by the auditor. If the requirements are met, the company will be recertified.

Each business is responsible for updating the certification/having the routine audit performed. The audit takes place during VLOG-compliant activity and/or production of "Ohne Gentechnik" and/or "VLOG geprüft" products. The routine audit is usually announced beforehand.

The audit interval requirements are set in Chapters B 2.2, C 2.1, D 2.2 and F 2.2.

Audit on suspicion:

Audits on suspicion serve to investigate suspected non-compliance; the auditor will only assess selected criteria on-site. Audits on suspicion are generally not announced beforehand. If the audit on suspicion is announced beforehand, the certification body must document the reason for it.

Combination audit:

Compliance with the VLOG Standard may be assessed during an audit in combination with other standards in order to take advantage of synergies. All prescribed VLOG facility descriptions, checklists and documents must be fully completed.

A 3.2 Types of Certification

With regard to VLOG certification of businesses, the Standard differentiates between

- Individual certification of businesses: For the requirements and procedure of individual certification see Chapter A 3.2.2 *et seqq*.
- Group certification in agriculture (for associated agricultural operations): For requirements and process of individual certification see Chapter E 2.
- Group certification in agriculture (for associated branch operations): For the requirements and procedure of individual certification see Chapter G 2.

A 3.2.1 Outsourcing of Processes and Products

If the business outsources activities subject to certification (processing procedures) to third parties ("contractors"), the contractors must undergo an on-site audit according to the VLOG Standard.

The basis for the audit is

- either a contractual agreement between the client and contractor, or

- an independent certification application filed by the contractor with a VLOG-recognised certification body.

If the audit is performed on the basis of the contractual agreement between the client and contractor, the scope of the auditor's on-site assessment is limited to assessing the contractor's production for compliance with the requirements of the VLOG Standard. The audit interval for the contractor is to be identical to that of the client. The contractor does not receive a VLOG certificate. As a minimum requirement, the agreement between the client and contractor must contain the details of the outsourced activity, its scope as well as the contractor's obligation to comply with the current VLOG Standard.

If the audit is performed based on an independent certification application submitted by the contractor, all VLOG commissions (potentially from a range of clients) are to be audited at the contractor's site. The contractor will receive its own VLOG certificate for the services rendered.

Exceptions from this provision, as well as the external storage of products, must be coordinated with the VLOG office.

A 3.2.2 Requirements for Individual Certification

The following requirements must be met at the beginning of the certification process:

- Agreement with the VLOG-recognised certification body
- Signed Standard Usage Agreement[1] with VLOG.

A 3.3 Applying for Certification

The business applies for certification at a VLOG recognized certification body and specifies the desired scope of applicability for certification (stage/sub-stage/product group). A written agreement is made between the business and the VLOG-recognised certification body regarding performance of neutral audits and certification according to the VLOG Standard.

A 3.4 Scope of Applicability / Certification

The business is to request the area of application desired for certification, which is then audited and confirmed in the certificate. Areas of application may include animal types or categories, products, or services (e.g. "trade in xy (product group)", "packaging of eggs"). Products are to be listed on the certificate in product groups.

- Animal types are to be specified in accordance with Annex VIII.
- For food products, product groups descriptions are to be selected in compliance with the legally mandated descriptions according to Art. 17 of Regulation (EC) No. 1169/2011. For agricultural products, Regulation (EC) No. 1308/2013, Appendix II serves as the relevant basis, supplemented by German regulations such as the "Konsummilch-Kennzeichnungs-Verordnung" (Consumer Milk Labelling Regulation), "Milch- und Margarinegesetz" (Dairy and Margarine Act), "Milcherzeugnis-Verordnung" (Dairy Product Regulation), "Käse-Verordnung" (Cheese Regulation), etc. If there are no legal requirements, either a description which has become customary may be used, such as in the "Leitsätzen für Fleisch- und Fleischerzeugnisse" (Guidelines for Meat and Meat Products), or a descriptive designation which may not be misleading.

[1] Known as "Certification Agreement" up to 20 June 2017

- If the scope of applicability relates to the production, packaging, or trading with eggs, the print numbers of the eggs for which the certificate applies must be included in an appendix to the certificate.
- For feedstuffs, the product group description comprises the feed category and the type or category of animal for which the feed is intended, in accordance with Annex VIII[2].

If new product categories are to be included within the scope of certification, the certification body is to decide whether this must be done through an expansion audit or on the basis of previously submitted documents (see Chapter A 3.1).

A 3.5 Risk Grading of Businesses

The VLOG Standard follows a risk-targeted approach for the evaluation of processes and monitoring in the business. This is done through risk grading of the business.

The risk grading serves to identify and estimate potential sources of introduction and risk of carryover of GMOs as well as any risk of commingling and confusion with non-compliant products in the business. With this in mind, the auditor[3] will evaluate the organisation as well as the spatial and temporal processes in the entire business. The use of GMOs and non-compliant raw materials in the company will result in being graded into a higher risk category.

Businesses at the Logistics, Agriculture and Food Stages will be graded by the auditor and certification body into risk categories as per the criteria in Chapters B 2.1, D 2.1 and F 2.1 based on risks.

In the area of feed, grading into risk categories will be done based on the production system of the “VLOG geprüft” production (e.g. dual or solely “exempt from mandatory labelling”).

In retail, the organisation of purchasing (centralised or decentralised) is relevant for risk grading.

Depending on the business stage, the risk grading and/or risk category will have an impact on audit intervals and/or the number of analyses.

Grading will be done by the company before the audit; it is assessed and, if necessary, redefined by the auditor in every audit. The definition is to be documented or modified as needed in the facility description and in the checklist.

A 3.6 Planning of Audits

In the case of announced audits

- the audit date/time and expected duration thereof, as well as
- the scope of the audit

are to be determined jointly by the auditor/certification body and the business. The auditor/certification body must draw up an audit plan.

[2] Examples: Floury compound feed for laying hens, mineral feed for cattle, soybean meal, by-products of the fermentation industry.

[3] The group organiser in the case of group certifications

A 3.7 Performance of the Audit

The on-site audit is to be organised as follows:

Introductory meeting:

- Introduction of the auditor and the persons involved
- Explanation of the planned auditing schedule
- Clarification of fundamental questions regarding the auditing schedule

Document Inspection 1:

- Inspection of the relevant documents of the business (e.g. organisational chart/organisation, quality management system, delivery bills)
- Verification of compliance with the standard requirements (e.g. declaration of raw materials, self-monitoring system, etc.)

Plant inspection:

- On-site assessment of the production areas and relevant production processes
- Interview of staff
- Verification of compliance with the system requirements (e.g. segregated handling, awareness of the risk of introduction and carryover of GMOs, etc.)
- Sampling as provided for and/or in the case of suspected non-compliance

Document Inspection 2:

- Mass flow control
- Further document inspection, if applicable

Evaluation of the requirements

Verification of the risk grading by the auditor

Closing meeting:

- Explanation of non-compliances
- Summary of findings and result

If applicable, determination of corrective actions by the business

If applicable, acceptance of the corrective actions by the auditor

Corrective actions may be agreed in the final meeting and laid down in writing. This will not affect the audit results. If corrective actions are determined and agreed after the audit, this must also be documented in writing and before the certificate is issued.

A 3.8 Evaluation of the Requirements

The auditor must evaluate the type and significance of each requirement. The auditor evaluates each requirement of the defined stages of the VLOG Standard and monitors compliance with them.

The following grading levels have been set for the evaluation of requirements at all stages:

Grading	Description	Points
A	Full compliance with a requirement	10 points
B	Minor to moderate deviations from a requirement	5 points
C	Non-compliance or major deviation from a requirement	- 10 points
N.A.	Not applicable	-
Risk	A requirement item is not met, with the result that the "Ohne Gentechnik"/ "VLOG geprüft" labelling is at risk.	- 15% of total points[4]
KO	Requirements which, if not complied with, critically affect the "Ohne Gentechnik/VLOG geprüft" labelling.	Audit not passed

A "risk" grade may be assigned for all requirement items not defined as KO requirements.

Grading into a **risk category** is assigned for all deviations that endanger the safety of the GMO-free system, such as:

- The self-monitoring system is insufficient
- The sampling and testing plan has not been adequately implemented
- The traceability system is not fully functional
- Transportation is not secured
- Missing/insufficient training of staff/staff not aware of responsibilities
- VLOG certificates or certificates of GMO-free status are not available
- Storage or production processes are not clearly segregated

In addition, specifically defined requirements may be assigned a KO grade. KO requirements may only be assigned an A, B, or KO grade. KO criteria are listed in the respective chapters of the stages and marked accordingly in the checklists; KO grading will result in the audit not being passed.

If an auditor reaches the conclusion that a particular requirement is not applicable to the business, this requirement may be assessed as N.A. (= not applicable). The issuing of an N.A. grade must be justified in the audit documentation. A KO requirement may not be graded N.A.

A 3.8.1 Determination and Handling of Corrective Actions

The business must determine corrective actions and deadlines for all deviations identified (B and C grading, as well as Risk and KO grading). Deviations must be explained clearly by the auditor in the checklist and the auditor must document the corrective actions and associated deadlines decided upon. If the business is to submit the corrective actions and deadlines at a later date, the business is responsible for documentation and submission by the deadline. Only once all corrective actions have been performed may a certificate be issued.

[4] 15% of the points total will be deducted for each criterion classified as a risk.

B and C deviations may be examined by subsequent submission of representative documentation or, if this is not possible, by an on-site follow-up audit. This is to be decided by the certification body in a risk-targeted manner.

Monitoring of the implementation of the corrective actions lies within the scope of responsibility of the certification body; the statements and/or catalogue of sanctions per Annex VI apply if the business is sanctioned and/or in connection with corrective actions (see Chapter A 3.8.2).

A 3.8.2 Audit Evaluation and Certification Conditions

In order to calculate the audit result, the points specified in the table in Chapter A 3.8 are awarded or deducted from the overall total.

The audit is considered as passed, if

- more than 75% of the maximum points have been achieved and
- no KO gradings were assigned and
- no GMOs were present in the "VLOG geprüft" and/or "Ohne Gentechnik" production areas, other than those considered adventitious or technically unavoidable

The audit is regarded as not passed, if

- less than 75% of the maximum points have been achieved and/or
- a KO grading was assigned
- GMOs not considered adventitious or technically unavoidable were demonstrably present in the "VLOG geprüft" and/or "Ohne Gentechnik" production area

Further course of the audit procedure

If non-compliance results in grading into a risk category, the VLOG certificate will not be issued until the corrective action has been implemented and reviewed. The certification body decides whether a follow-up audit is necessary.

If a KO criterion is graded as KO, no certificate will be issued. The certification body must suspend the current VLOG certificate and inform VLOG within 2 working days. The business must implement the required corrective actions before the certificate is re-issued. A new initial audit must be performed.

If the audit is not passed and no KO grading was assigned, the certification body must inform VLOG of the failed audit within 2 working days. A new initial audit must be performed.

If GMOs not considered adventitious or technically unavoidable were demonstrably identified in the VLOG food processing area, the certification body must revoke the VLOG certificate with 2 working days and also inform VLOG thereof.

When the audit is not passed, VLOG will make a decision on the termination of the Standard Usage Agreement, and also on the revocation of the respective usage licence for the "Ohne GenTechnik" and/or "VLOG geprüft" seal from licensees.

A 3.9 Evaluation/Review by the Certification Body

Within the scope of the evaluation/review of the VLOG audit, the grading of the auditor in the completed checklist and the information indicated in the facility description will be re-checked by the certification body for completeness and plausibility. In this regard – if relevant for the respective stage – the risk grading is also to be reviewed by the certification body and corrected, if appropriate. If the risk grading is corrected, the business must be informed thereof as soon as possible.

The certification body is entitled to perform follow-up audits, audits for suspected non-compliance and additional checks (see Part H).

A 3.10 Certificate Issuance

A 3.10.1 Requirements for Certificate Issuance

Following an audit passed and taking into consideration Chapter A 3.8.2, the certification body will issue the business a certificate according to the VLOG Standard.

A certificate will be issued to the business that has concluded a monitoring agreement with the certification body and has additionally concluded a Standard Usage Agreement[1] with VLOG.

VLOG will only accept certificates according to the VLOG Standard from certification bodies that have concluded a Recognised Certifier Agreement with VLOG.

A 3.10.2 Requirements for VLOG Certificates

VLOG certificates will be issued according to Annex VII. Layout deviations are not permissible without approval by VLOG. The scope of application of the certificate must be formulated pursuant to Chapter A 3.4.

If information about the certified business sites and/or scope of applicability is indicated on a certificate annex, the following requirements additionally apply:

- The annex must contain a reference to the certificate, including specification of the unique certificate identification number.
- The complete name of the certified business must be listed in the annex.
- The annex must be assigned a unique identifier.
- The certificate must contain a reference to the annex, including specification of this unique identifier.

A 3.10.3 Validity Period of the VLOG Certificate

The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).

A 3.10.4 Transferring Certification in the Event of Change of Ownership or Certification Body

Transferring Certification in the Event of Change of Ownership or Change of Business Name

If a change of ownership/change of business name occurs at a VLOG-certified business/site, VLOG certification may be transferred to the new business.

The following steps must be taken in this regard:

1. The previously VLOG-certified business gives the certification body permission to use the data for the new business.
2. The certification body undertakes VLOG certification of the new business on the basis of previously submitted audit documents; the period of validity of the updated VLOG certificate may not exceed that applicable to the previous certificate.
3. The certification body provides the updated certificate and the information regarding change of ownership/change of business name to VLOG as soon as possible.

If applicable, further requirements must be clarified with the responsible certification body.

For group certifications, the following additionally applies: The risk categories and audit intervals of the group members will remain in effect.

Transferring Certification in the Event of a Change of Certification Body

For a change of certification body, VLOG certification may be updated by the new certification body on the basis of the previous routine audit. For this to be done, the consent of the certified business as well as of the former and new certification bodies is required.

The following steps must be taken in this regard:

1. The VLOG-certified business declares its consent to the previous certification body for the data to be forwarded to the new certification body.
2. The previous certification body informs VLOG regarding the termination/cancellation of the contractual relationship with the VLOG-certified business.
3. The previous certification body transfers the complete audit and certification documents from the most recent routine audit, and any follow-up audits, to the new certification body.
4. The new certification body may certify the business according to the VLOG Standard on the basis of the complete audit documents; the period of validity of the updated VLOG certificate may not exceed the period of validity of the previous certificate.
5. The new certification body sends the updated certificate and information regarding the recertification to VLOG.

For group certifications, the following additionally applies: The risk categories and audit intervals of the group members will remain in effect.

A 4. Integrity Programme

The Integrity Programme comprises various measures intended to ensure the quality and correct implementation of the VLOG Standard. Within the scope of the Integrity Programme, various audits and on-site inspections are to be performed at the sites of Standard participants. VLOG or a third party commissioned by VLOG will perform inspections, including sampling, if applicable, within the scope of “Integrity Audits” at the sites of licensees and VLOG-certified businesses. The inspections may be performed in all areas of the business that are relevant to “Ohne Gentechnik” and/or “VLOG geprüft” production as well as at any transport, pre-processing, processing or packaging operations involved in the auditing and certification process, if applicable. The selection is performed in a risk-targeted manner or by reason of complaints. Furthermore, inspections may also be carried out in agricultural operations that are contractually integrated into the “Ohne Gentechnik” system of a group organiser within the scope of group certification pursuant to the VLOG Standard. Monitoring of the Integrity Programme is to be coordinated with the business involved.

A 5. Review of the VLOG Standard

The VLOG Standard is reviewed, revised and supplemented on a regular basis. The VLOG Board of Directors is advised in this regard by the Standard Technical Working Group. In order to enable information about the upstream and downstream areas of food production to be incorporated into the Standard, relevant sectors are represented in the Standard Technical Working Group. The VLOG board of directors decides regarding membership in the Standard Technical Working Group.

Part B: Logistics

In the following section, the specific rules and requirements for the Logistics Stage and its sub-stages are described.

B 1 Stage Definition and Mandatory Certification

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of certification obligation	Requirements according to the Standard
Transport: Transport means conveying goods from one place to another.				
Feed/Food	For transport of bulk "VLOG geprüft" feed and/or bulk VLOG-certified food/ingredients between VLOG-certified businesses, provided that at least one of the following statements is accurate: • Transport is not integrated into the self-monitoring system of a VLOG-certified business. • No agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded	For the transport of bulk "VLOG geprüft" feed and/or bulk VLOG-certified food (ingredients) between VLOG-certified businesses, provided that all of the following three statements are accurate: • Order placed by a VLOG-certified business • Transport is integrated into the self-monitoring system of a VLOG-certified business.	Yes	B 1 to B 4, I 3

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of certification obligation	Requirements according to the Standard
	between the carrier and the certified business.	• An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the carrier and the certified business.		
		For transport of bagged/tamper-resistant packaged "VLOG geprüft" feed and/or "Ohne Gentechnik" food.	Yes	
		For transport of bulk VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of commingling or tampering.	Yes	
Storage/handling: The service of temporary storage of food and/or feed on behalf of a third party or storage in one's own external warehouses. Handling comprises all activities directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).				
Feed	For storage/handling of bulk "VLOG geprüft" feed • as of 01/01/2019 and/or	For storage/handling of bulk "VLOG geprüft" feed up to 31/12/2018, provided that all of the following four requirements are satisfied:	Yes	B 1 to B 4, I 3

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of certification obligation	Requirements according to the Standard
	• as of 01/01/2018, if not all of the following requirements are satisfied: - The business is QS or GMP+ certified - Ensuring the labelling exemption according to Regulations (EC) No. 1829/2003 and 1830/2003 is a component of the business's HACCP concept - Success of the measures is verified through periodic tests.	• The business is QS or GMP+ certified • Maintenance of the labelling exemption according to Regulations (EC) No. 1829/2003 and 1830/2003 is a component of the business's HACCP concept • Success of the measures is verified through periodic tests. • For storage/handling of sacked/tamper resistant packaged feed	Yes	
Food	For storage/handling of bulk, VLOG-certified food/ingredients of animal origin, if they are not clearly labelled and/or there is a risk of commingling or tampering.	For storage/handling of bulk, VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of commingling or tampering.		

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of certification obligation	Requirements according to the Standard
Trading/drop shipping: Trading comprises all activities within the scope of which goods are sold – not produced at one's own facilities – and resold, including import and drop shipping. Drop shipping refers to the trading method wherein the goods are transported directly from the producer to the customer of the drop shipper. The drop shipper does not take possession of the goods; however, it is the party with whom the customer has a contractual relationship and who issues the invoice for the goods.				
Feed	For feed traders that are already VLOG-certified and also want to label bulk feed as "VLOG geprüft"* on the bill of lading. For traders that have not previously wanted to convert VLOG-certified single-component feed into "VLOG geprüft" quality and label it as such*. These will be categorized as feed businesses according to the requirements in Part C (activity subject to certification). For traders that sack bulk "VLOG geprüft"* feed and label it, and that also want to designate it as "VLOG	For drop shippers of "VLOG geprüft" feed and traders that transport "VLOG geprüft" feed but who do not otherwise handle it within the meaning of Regulation (EC) No. 178/2002, provided that all of the following three criteria are satisfied: • The business is QS or GMP+ certified • Maintenance of the labelling exemption per Regulations (EC) No. 1829/2003 and No. 1830/2003 is a component of the HACCP concept, and • The success of the measures is verified through periodic tests.	Yes	B 1 to B 3, B 5, I 3

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of certification obligation	Requirements according to the Standard
	geprüft" on labels, declarations or bills of lading.	For trading of sacked/tamper resistant packaged feed.		
Food	For trading of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of commingling or tampering.	For trading of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of commingling or tampering.	Yes	
		For trading of VLOG-certified food/ingredients of animal origin once they are packaged into end-consumer packaging.	Yes	

* (Wording or seal according to Chapter A 1.2.2)

B 2 Details of the Certification Procedure

B 2.1 Risk Grading

Risk grading by the auditor (see Chapter A 3.9) will be carried out according to the following criteria.

B 2.1.1 Risk Category 0

- There is no or only very low risk
- Businesses that transport, trade, handle or store within the business GMOs or products produced from them may not be graded into Risk Category 0.

B 2.1.2 Risk Category 1

- There is a medium risk.
- Businesses and process steps with clear spatial segregation during transport, storage, handling and trading of products for which a “VLOG geprüft” or “Ohne GenTechnik” label would be permissible, and of such products that do not meet the requirements for the “VLOG geprüft” or “Ohne Gentechnik” label

Transport, storage, handling as well as trading of food/food ingredients:

- Businesses and process steps without spatial segregation but with temporal segregation during transport, storage, handling and trading of food/food ingredients for which an “Ohne Gentechnik” label would be permissible and of such products that do not meet the requirements of the “Ohne Gentechnik” label, but which are not themselves GMOs and/or are not produced from or do not contain GMOs.

B 2.1.3 Risk Category 2

- High risk of commingling GMO-free raw materials with such containing GMOs

  Transport, storage, handling and trading of feed:

- Businesses and process steps without spatial but with temporal segregation during transport, storage, handling and trading of products for which a “VLOG geprüft” label would be permissible and of such products that do not meet the requirements for the “VLOG geprüft” label.

Transport, storage, handling as well as trading of food/food ingredients:

- Businesses and process steps without spatial but with temporal segregation during transport, storage, handling and trading of food/food ingredients for which an “Ohne Gentechnik” label would be permissible and of GMOs and/or food/food ingredients that are produced from, with, or contain GMOs

Further grading criteria for trade:

- Test results from the most recent audit period found non-compliance with the VLOG Standard resulting from the omission of measures to prevent carryover

B 2.2 Audit Frequency

Routine audits are to be carried out annually.

B 2.3 KO Requirements

The following KO requirements have been determined:

- Self-Monitoring Concept/Risk Analysis (B 3.3)
- Traceability System (B 3.7)
  Crisis Management (B 3.11)

B 3 General Requirements for Businesses

These requirements also apply to external service providers commissioned with transporting, storing and/or handling of VLOG-certified raw materials or "VLOG geprüft" feed.

B 3.1 Facility Description

The facility description according to Annex IX is to be produced and kept updated.

Information provided in electronic form will be accepted. The up-to-date facility description, annexes and the documents and test results listed therein must be submitted to the auditor for viewing. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents specified therein are be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

At the latest by the next audit, an updated facility description is to be submitted. A report or communication to the certification body is only required in the case of material changes, e.g. the risk category, relating to the VLOG certification.

B 3.2 Assignment of Responsibilities/Organisational Chart

The latest version of the business or facility structure and an organisational chart containing details on responsibilities, and a deputy plan to cover for absence must be available on the premises in written form.

An overview of all persons working in a "VLOG geprüft" and/or "Ohne Gentechnik"-relevant business process is to be produced. This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

B 3.3 Self-Monitoring Concept / Risk Analysis (KO)

The self-monitoring concept including a risk analysis is to take into consideration the required segregated handling of GMO-free products and products containing GMOs, as well as any potential sources of contamination and carryover. A risk assessment analogous to the HACCP concept must be carried out. Precautionary, monitoring and controlling measures based on the HACCP concept are to be introduced to ensure the absence of a need to label according to Regulations (EC) No. 1829/2003 and No. 1830/2003, or use of a claim which indicates the suitability of the feed and raw materials for the production of "Ohne Gentechnik" food, or the use of the "VLOG geprüft" label.

The self-monitoring concept comprises at least the following criteria:

- Registration of all raw materials and feed for the “VLOG geprüft” or “Ohne Gentechnik” section, respectively
- Separate handling of products for which “Ohne Gentechnik” or “VLOG geprüft” labelling would be permissible and such products not meeting the requirements for “Ohne Gentechnik” or “VLOG geprüft” certification
- Identification and exclusion of sources of contamination and carryover
- Risk analysis, taking into consideration potential risks from certain feeds or raw materials, countries of origin and production processes as well as facility parameters
- Procedures for cleaning, inspection of the loading process, previous freight in the case of vehicles

B 3.4 Commissioning External Service Providers

If transport, handling and storage of VLOG-certified businesses are outsourced, the outsourced task will be considered within the self-monitoring concept / risk analysis of the business, and an agreement on compliance with the logistics requirements of the VLOG Standard is to be concluded with the business commissioned with the task (see Chapter A 3.2.1).

Employees of commissioned businesses are not required to be trained by the VLOG-certified business. The commissioned business must train / inform employees within the scope of the above-mentioned agreement.

B 3.5 Declaration on Delivery slip

VLOG-certified feed must be marked by the certified feed business with the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Figure 2). If the “VLOG geprüft” seal is used, the requirements of Chapter A 1.2.2 must be complied with.

VLOG recommends the following wording for the declaration of feed exempt from labelling and not certified by VLOG:

“The following feed produced and/or distributed by us is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms…”

VLOG-certified raw materials must be labelled as “VLOG” goods on all bills of lading. Food that meets the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) but which is not part of the VLOG-certification of the business, is to be labelled on all bills of lading as “Ingredient suitable for the production of food labelled “Ohne Gentechnik”.

In cases where no waybills/bills of lading are produced due to the nature of the system (e.g. milk pickup), an unequivocal contractual provision regarding the delivery must be in effect or other documentation is required that safeguards procedural compliance.

B 3.6 Segregation of the Flow of Goods / Exclusion of Commingling

It must be ensured that at no time raw materials or feed not suitable for “VLOG geprüft” or “Ohne Gentechnik” labelling make their way into the flow of raw materials and feed for “Ohne Gentechnik” or

"VLOG geprüft" labelling. For this purpose, the flow of goods must be separated spatially or temporally during storage, handling and transport. In addition, all products must be clearly and seamlessly labelled.

In the case of temporal segregation, it must be ensured by suitable process steps that any carryover of GMOs or non-compliant feed/raw materials is reduced to a technically unavoidable minimum. Vehicles must be verifiably dry cleaned after transporting bulk raw materials or feed labelled as genetically modified pursuant to Regulations (EC) No. 1829/2003 and No. 1830/2003.

The risk-targeted process steps (e.g. transport and mixing processes) must be documented for each facility with separate proof of adequate physical, temporal or logistical measures, e.g. as part of the self-monitoring concept, and are to be taken into account in self-monitoring.

B 3.7 Traceability System (KO)

A traceability system must be installed permitting instant identification of all products in the business to which the "Ohne Gentechnik" labelling applies. In addition, it must be possible to trace back within one working day any products that have left the business and to compile lists of quantities and evaluations which permit conclusions on the flows of goods and their plausibility. According to Regulation (EC) No. 178/2002 the following data must be compiled for this purpose:

- Information regarding origin (country, supplier)
- Creation of batches, if applicable (incl. re-working)
- Production/manufacturing records
- Information on delivery date and market participants supplied
- Quantity

B 3.8 Handling of Non-Compliant Products / Positive Test Results

For the event of positive test results or other findings regarding a lack of proven compliance with the "VLOG geprüft" or "Ohne Gentechnik" requirements, a system of defect handling and labelling/blocking of non-compliant products with appropriate measures is to be put in place before the goods are shipped.

Positive test results are to be treated according to Annex IV.

B 3.9 Staff Training

All staff members involved in operating procedures of relevance to "Ohne Gentechnik" or "VLOG geprüft" labelling, including vehicle operators, must be instructed in the "Ohne Gentechnik" or "VLOG geprüft" requirements and the operating procedures laid down for this purpose. Instruction is to take place before they take up their activity as well as on an ongoing basis, at least once a year.

The intensity of training varies depending on the staff member and is to be oriented towards the responsibility of the staff member for the proper flow of the "VLOG geprüft" or "Ohne Gentechnik" operating procedure.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

B 3.10 Complaint Management and Goods Recall

Complaints concerning the requirements of the VLOG Standard by clients or other bodies (e.g. local authorities) or deviations within the self-monitoring system must be documented and evaluated appropriately. Suitable corrective action, including the determination of responsibilities, must be initiated.

If non-compliances are detected in “VLOG geprüft” feed or products related to the “Ohne Gentechnik” label which are still in the market, a recall system must be in place that provides for immediate/written notification of the customers. If necessary, feed must be taken back at the expense of the logistics business.

B 3.11 Crisis Management (KO)

A crisis management system must be in place and potential dangers analysed. As part of this system, a process is to be in place that prescribes the procedure to follow in the event of a crisis. Emergency numbers/contact details of suppliers and clients must be at hand.

An internal system for blocking rejected products must be in place.

The business must inform its customers as rapidly as possible of any problems related to product specifications, in particular non-conformities relating to “Ohne Gentechnik” or “VLOG geprüft” which have, had, or could have a defined influence on the label safety and/or legality of the relevant products. This must be done in accordance with the precautionary principle, but is not limited to it.

B 3.12 Corrective Action/Ongoing Improvement Process

The business must ensure that through regular verification of the implemented system the occurrence of adventitious contamination with GMOs be continuously reduced. The business must take measures, so-called corrective action, in order to eliminate the causes of adventitious and technically unavoidable contaminations with GMOs and to reduce their entry to a minimum. The measures taken must be monitored and will be subjected to evaluation after an adequately set period of time. This applies to the corrective action from the last audit as well.

In particular, the handling of positive test results must be taken into consideration (see Chapter B 3.8).

B 3.13 Documentation and Retention Period

Records must be easily legible and authentic. They must be kept in such a manner that *post factum* manipulation is not possible. All documents relating to the “VLOG geprüft” and/or “Ohne Gentechnik” transport, storage, handling or trading, e.g. waybills/records, clearance certificates, training documents, etc. are to be retained for the following period, unless statutory provisions require a longer retention period: minimum shelf life of the batch / lot + one year, but not less than two years.

B 3.14 Protecting the Self-Monitoring System

Internal audits are to be carried out in the business annually.

B 4 Specific Requirements for Transport, Handling and Storage

B 4.1 Incoming Goods Inspection

If the delivered raw materials and feed are “VLOG geprüft” or of “Ohne Gentechnik” quality, this must be evident from the incoming goods documents or order documents.

B 5 Specific Requirements for Trade

B 5.1 Incoming Goods Inspection

At goods receiving, it is to be ensured that all “Ohne Gentechnik” raw materials or “VLOG geprüft” feed meet(s) requirements. For this purpose, confirmation is to be obtained for every delivery from the immediate upstream supplier.

Within the scope of the incoming goods inspection of VLOG-certified raw materials and/or feed,

- the bills of lading must be checked for “VLOG geprüft” and/or “Ohne Gentechnik” / “VLOG” identification.
- certification of the supplier is to be checked periodically, the minimum being once annually.

A complaint is to be issued to the supplier for an incomplete bill of lading. The feed or raw materials may be marketed as “VLOG geprüft” and/or “Ohne Gentechnik” only if this quality has been verifiably confirmed by the VLOG-certified supplier.

B 5.2 Sampling and Testing

Risk-targeted sampling and testing of feed for GMO within the scope of the self-monitoring system is to be undertaken as follows.

The business must have a test plan that describes the sampling and testing procedure. The focus of consideration must be on the following: type of samples, sampling locations, sampling of finished product, compilation of collective samples, naming the sampler, creation of reference samples, sample size, and sampling frequency. The test plan is to be implemented according to schedule.

If only feed/raw materials in which genetic modification cannot be detected in PCR tests due to technical limitations is/are traded in the business, no sampling/GMO testing is necessary. In this case the test plan must provide for a risk analysis that comes to the conclusion that it is not necessary to sample/analyse any raw materials/feed.

Sampling and testing frequency:

The following sampling frequency is to be implemented yearly. The auditor is authorised to take additional samples and/or carry out other GMO tests on a risk-targeted basis or in suspicious cases. All samples must be analysed according to Annex III. Only test results calculated according to the requirements in Chapter I 2 and I 3 in connection with Annex III will be considered. The tests are to be carried out in laboratories recognised by VLOG as of 1/1/2019 at the latest.

Trading of Feed:

List of VLOG products at site / List of products at site	Bulk "VLOG geprüft" feed	VLOG bagged goods
	Annual minimum number of samples/tests of "VLOG geprüft" outgoing goods	
Bulk "VLOG geprüft" feed	up to 10,000 t/year: 1 sample ≥ 10,000 to 50,000 t/year: 2 samples ≥ 50,000 to 100,000 t/year: 4 samples ≥ 100,000 to 200,000 t/year: 6 samples ≥ 200,000 to 300,000 t/year: 8 samples for every additional 100,000 t: 2 additional samples	no (additional) sampling
Bulk "VLOG geprüft" feed + bulk feed not subject to mandatory labelling		
Bulk "VLOG geprüft" feed + bulk feed subject to mandatory labelling	up to 2,000 t/year: 1 sample > 2,000 to 5,000 t/year: 3 samples > 5,000 to 10,000 t/year: 5 samples ≥ 10,000 to 50,000 t/year: 10 samples ≥ 50,000 to 100,000 t/year: 15 samples ≥100,000 to 200,000 t/year: 20 samples ≥ 200,000 to 300,000 t/year: 25 samples for every additional 100,000 t: 5 additional samples	no (additional) sampling
"VLOG geprüft" feed + tamper resistant packaged feed subject to mandatory labelling	no (additional) sampling	no (additional) sampling

Trading of "Ohne Gentechnik" food/ingredients:

Risk category	Annual minimum number of samples/tests of "Ohne Gentechnik" outgoing goods
0	2 x per year
1	6 x per year
2	12 x per year

The number of samples may be correspondingly reduced if the number of lots received in the audit period is smaller than the minimum number of samples listed in the table.

B 5.2.1 Test Results

The analysis results from the self-monitoring system and any resulting (corrective) measures are to be reviewed in the course of the audit. It is the auditor's responsibility to take supplementary samples during the audit on a risk-targeted basis and in suspicious cases. The samples and tests serve to test the self-monitoring system. The results may also be incorporated into the self-monitoring system and thereby reduce the number of samples in the self-monitoring system. Expenses are to be split between the certification body and the client seeking certification.

Part C: Feed

The following section describes the specific rules and requirements for the Feed Stage and its sub-stages.

C 1 Stage Definition and Certification Obligation

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of mandatory certification	Requirements according to the Standard
Feed manufacturing / processing: All process steps that go beyond simple, external processing, e.g. the manufacture of post-extraction rapeseed meal (which arises as a by-product during the extraction of oil from rapeseed/canola). Also encompasses the trading of single-component feed exempt from the labelling obligation that is incorporated into "VLOG geprüft" quality.				
Compound and single-component feed	For bulk and/or bagged/packaged compound and single-component feed produced in the business that are used in the "Ohne Gentechnik" production of food and are intended to be advertised as "VLOG geprüft"*.	For bulk and/or bagged/packaged compound and single-component feed that are used in the "Ohne Gentechnik" production of food and are not intended to be advertised as "VLOG geprüft".	Yes	C 1 to C 3, C 5, I 3

Feed transport: Feed transport means the conveyance of feed from one place to another.				
Compound and single-component feed	See Part B Logistics	See Part B Logistics	Yes	C 1 to C 4, I 3
Feed storage/handling: The service of temporary storage of feed on behalf of a third party or storage in one's own external storage area. Handling comprises all activities directly related to the movement of goods in transit (i.e. unloading, interim storage, if applicable, as well as reloading of goods being transported).				
Compound and single-component feed	See Part B Logistics	See Part B Logistics	Yes	C 1 to C 4, I 3
Trading of feed: Trading comprises all activities within the scope of which goods are sold – not produced at one's own facility – and resold, including import and drop shipping. Drop shipping refers to the trading method wherein the goods are transported directly from the producer to the customer of the drop shipper. The drop shipper does not take possession of the goods; however, it is the party with whom the customer has a contractual relationship and who issues the invoice for the goods.				
Compound and single-component feed	See Part B Logistics	See Part B Logistics	Yes	C 1 to C 4, I 3
Mobile grinding and mixing facility: Production of compound feed using mobile facilities (complete or supplementary feed) in the agricultural operation.				
Compound and single-component feed	For services rendered in "Ohne Gentechnik" production that are to be advertised as "VLOG geprüft"*.	For services rendered in "Ohne Gentechnik" production that are not to be advertised as "VLOG geprüft".	No	C 1 to C 3, C 6, I 3

* (Wording or seal according to Chapter A 1.2.2)

C 2 Details of the Certification Process

C 2.1 Audit Intervals

Routine audits are to be carried out annually.

C 2.2 KO Requirements

The following KO requirements are determined:

- Self-Monitoring Concept/Risk Analysis (C 3.3)
- Traceability System (C 3.7)
- Crisis Management (C 3.11)
- Reference Samples (C 5.1)

C 3 General Requirements

C 3.1 Facility Description

The facility description according to Annex XI is to be produced and kept updated.

Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents listed therein are to be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents/information specified therein are be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

At the latest by the next audit, an updated facility description is to be submitted. A report or communication to the certification body is only required in the case of material changes relating to the VLOG certification.

C 3.2 Assignment of Responsibilities / Organisational Chart

The latest version of the business or facility structure and an organisational chart containing details on responsibilities, and a deputy plan to cover for absence must be available on the premises in written form.

An overview of all persons working in a “VLOG geprüft”-relevant business process is to be produced. This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

C 3.3 Self-Monitoring Concept / Risk Analysis (KO)

The self-monitoring concept including a risk analysis of the feed business must take into consideration the required segregated handling of GMO-containing and GMO-free products as well as any possibility of

introduction and contamination, and must reflect the production situation of the facility/business. Analogously to the HACCP, a risk assessment must be carried out which includes cleaning. Preventative, monitoring and control measures based on the HACCP concept must be introduced to ensure the absence of a need to label according to Regulation (EC) No. 1829/2003 and No. 1830/2003 or use of a claim that indicates the suitability of the feed for the production of “Ohne Gentechnik” food or the use of the “VLOG geprüft” label.

The self-monitoring concept of the feed business must comprise at least the following criteria:

- Compilation of all feed for the "VLOG geprüft" part of the business no matter whether subject to labelling obligations or not.
- Segregated handling of “VLOG geprüft” feed subject to labelling and feed that is not, at all stages of storage, processing and transport
- Identification and exclusion of sources of contamination and carryover
- Individual, batch-specific risk assessment (at risk/not at risk) of single-component feed for “VLOG geprüft” production or labelling analogously to an HACCP. The risk assessment is to be documented in writing. Test results from VLOG-certified upstream suppliers may also be taken into account. The risk grading of the various feeds (at risk/not at risk) must be transparent for the auditor. An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business (http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/dokumente/Bewertungshilfe_Risikobehaftete_Futtermittel_ENG.pdf).
- Specifications for all finished products for “VLOG geprüft” labelling must be in place and must be laid down in writing with the contract partners if required
- Compounding logs must be available

The defined goal is to avoid GMO components in order to reliably meet the criteria for labelling according to EU Guidelines.

C 3.4 Commissioning External Service Providers

If the business outsources transport, handling and storage to an external service provider, the outsourced task is to be taken into account within the self-monitoring concept/risk analysis of the business and an agreement on compliance with the requirements of the VLOG Standard is to be concluded with the business commissioned with the task (see Chapter A 3.2.1).

Employees of commissioned businesses are not required to be trained by the VLOG-certified business. The commissioned business must train/inform the employees within the scope of the above-mentioned agreement.

C 3.5 Incoming Goods Inspection

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for “VLOG geprüft” production and/or labelling.

For all single-component feed graded by companies as “at risk” (see Chapter C 3.3) confirmation from the upstream supplier is required. This may be done e.g. by way of:

- A separate declaration of the GMO-free status of the currently delivered batch/lot

- A current, detailed certificate in accordance with the VLOG Standard or a recognised VLOG-equivalent standard
- A test result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered
- An additional indication on the delivery slip declaring the products to be exempt from labelling
- A clear contractual regulation regarding the delivery of feed exempt from labelling

Furthermore, for feed additives and declared auxiliary ingredients, it must be documented in writing that the product is not subject to labelling obligations.

VLOG-certified feed must be labelled on the bills of lading using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Figure 2). A complaint is to be issued to the supplier for incomplete bills of lading.

VLOG recommends the following wording for the declaration of non-VLOG-certified feed exempt from mandatory labelling: “The following feed produced and/or distributed by us is exempt from mandatory labelling within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and Regulation (EC) no. 1830/2003 on the traceability and labelling of genetically modified organisms and the traceability of food and feed products made from genetically modified organisms”.

C 3.6 Segregation of the Flow of Goods / Exclusion of Technically Avoidable Commingling

It must be retraceably ensured that at no time raw materials or feed not suitable for producing “Ohne Gentechnik” food make their way into the flow of raw materials and feed intended for the production of “VLOG geprüft” food. For this purpose, the flow of goods must be segregated spatially and/or temporally. In addition, all products must be clearly and seamlessly labelled.

In the case of temporal segregation, it must be ensured by suitable process steps that any carryover of genetically modified material is reduced to a technically unavoidable minimum.

During handling and storage in the production facility, the labelling of raw materials/partially finished products/finished products regarding GMOs must be properly implemented in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003.

These risk-preventing process steps (e.g. transport and mixing processes) must be documented for each facility with a separate proof of adequate spatial, temporal or logistical measures, e.g. as part of the self-monitoring concept, and are to be taken into account during self-monitoring.

C 3.7 Traceability System (KO)

A traceability system must be installed permitting at any time to identify instantly all products in the facility/monitored site, to which “VLOG geprüft” labelling applies. In addition, it must be possible to trace back within one working day any products that have left the facility/monitored site and to compile quantitative statements and evaluations which permit conclusions on flows of goods and their plausibility. According to Regulation (EC) No. 178/2002 the following data must be collected for this purpose:

- Information regarding origin (country, supplier)
- Batch/lot formation, if applicable (including re-working)
- Documentation of production/manufacture

- Information on delivery date and market participants supplied
- Quantity

C 3.8 Handling of Non-Compliant Products/Positive Test Results

For the event of positive test results or other findings regarding a lack of proven compliance with the "Ohne Gentechnik" requirements, a system of defect handling and labelling/blocking of non-compliant products with appropriate measures must be installed before goods are shipped. In the event of contamination, appropriate corrective action must be initiated and documented. The efficiency of such measures is to be reviewed as part of self-monitoring.

Positive test results are to be handled according to Annex IV.

C 3.9 Staff Training

All staff members involved in operating procedures of relevance to "VLOG geprüft" labelling, including vehicle operators, must be instructed in the "VLOG geprüft" requirements and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity as well as on an ongoing basis, at least once a year.

The intensity of training varies depending on the staff member and must be geared towards the responsibility of the staff member for the proper flow of the "VLOG geprüft" production.

These training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

C 3.10 Complaint Management and Goods Recall

Complaints concerning the requirements of the VLOG Standard by clients or other bodies (e.g. local authorities) or deviations within the self-monitoring system must be documented and evaluated appropriately. For this purpose, suitable corrective action, including the determination of responsibilities, must be initiated.

If non-compliances are detected in feeds that are still in the market, a recall system must be in place. This includes written notification of customers. If necessary, feed must be taken back at the expense of the feed producer (see Annex IV).

C 3.11 Crisis Management (KO)

A crisis management system must be in place and potential dangers analysed. As part of this system, a process is to be in place that prescribes the procedure to follow in the event of a crisis. Emergency numbers/contact details of suppliers and clients must be at hand.

An internal system for blocking rejected products must be in place.

The business must inform its customers as rapidly as possible of any problems related to product specifications, in particular non-conformities relating to "VLOG geprüft" which have, had, or could have a defined influence on the process safety and/or legality of the relevant products. This must be done in accordance with the precautionary principle, but is not limited to it.

C 3.12 Corrective Action/Ongoing Improvement Process

The business must ensure that through regular verification of the implemented system the occurrence of adventitious contamination with GMO material is continuously reduced. For this purpose, the business must take measures, so-called corrective action, in order to eliminate the causes of adventitious and technically unavoidable contamination with GMO material and to reduce their entry to a minimum. The measures taken must be monitored and will be subjected to evaluation after an adequate period of time.

This applies also to the corrective action from the last audit.

In particular, the handling of positive test results must be taken into consideration (see Chapter C 3.8).

C 3.13 Documentation and Retention Period

The records must be easily legible and authentic. They must be kept in such a manner that post facto manipulation is not possible. All documents in connection with the production process for "VLOG geprüft" labelling, e.g., way bills, clearance certificates, records of production and of product flow (including re-working), training documents, etc. must be kept from the time of delivery for the following period of time, unless statutory requirements stipulate a longer retention time: Minimum shelf life of the batch + 1 year, but not less than 2 years.

C 3.14 Protecting the Self-Monitoring System

Internal audits are to be performed by the business every year.

C 4 Specific Requirements for Transport, Handling, Storage, Trading of Feed

If the business performs activities in the area of transport, handling, storage and trading of feed that is subject to the certification obligation, the relevant requirements according to Chapter B 3 to B 5. must be complied with.

C 5 Specific Requirements for Production

C 5.1 Reference Samples (KO)

In addition to the provision of data, the business is obligated to retain samples of all batches sent to customers, in suitable containers, so that a conclusion can be drawn as to the quality actually delivered, if necessary. The reference samples must be retained for a period of time appropriate to the intended purpose and product perishability of the feed. This applies both to products delivered in bulk and to packaged products.

C 5.2 Sampling and Testing

There is to be a risk assessment of any single-component feed used for "VLOG geprüft" production and labelling of single-component feeds, which will be the basis for risk-targeted sampling and testing of feed for GMO within the scope of the company's self-monitoring system according to Chapter C 3.3.

If the business, for its "VLOG geprüft" production, only uses feed in which, due to technical limitations, genetic modification cannot be detected through PCR tests, no sampling/GMO test is necessary. In this case the test plan must provide for a risk analysis that comes to the conclusion that it is not necessary to sample/analyse any feed.

The frequency of sampling and test results from the business' individual risk assessment of single-component feed for "VLOG geprüft" production and the feed quantity produced. The business must have a test plan that describes the sampling and testing procedure. The focus of consideration must be on the following: type of samples, sampling locations, sampling of finished product, formation of collective samples, naming the sampler, creation of reference samples, sample size, and sampling frequency. The test plan must be implemented as scheduled and evenly over the audit period.

Sampling and testing frequency:

The numbers of samples/tests listed below are the annual minimums. The auditor is authorised to take additional samples and/or carry out additional GMO tests on a risk-targeted basis or in suspicious cases.

Single-component feed graded as risk-prone based on the business' risk assessment must be sampled in lots. To safeguard the system, outgoing goods (compound and/or single-component feed) intended to be identified as "VLOG geprüft" must be sampled according to the following plan.

All samples must also be analysed. Only test results arrived at according to the requirements in Chapter I 2 and I 3 in connection with Annex III will be considered. The tests are to be carried out in laboratories recognised by VLOG as of 1/1/2019 at the latest.

All feed quantities specified in the following tables relate exclusively to feed that is either intended to be used in "VLOG geprüft" production and/or are to be labelled as "VLOG geprüft", depending on the respective facility.

Yearly minimum of sampling/testing at the Feed Production sub-stage

Area	**Sampling at "VLOG geprüft" goods receiving**	**Samples in "VLOG geprüft" outgoing goods**
Sample material **Production**	**Single-component feed**	**VLOG-certified single-component feed*** **and/or VLOG-certified compound feed**
Production completely not subject to compulsory labelling	For every batch of single-component feed graded as risk-prone	up to 10,000 t/year: 1 sample ≥ 10,000 to 50,000 t/year: 2 samples ≥ 50,000 to 100,000 t/year: 4 samples ≥ 100,000 to 200,000 t/year: 6 samples ≥ 200,000 to 300,000 t/year: 8 samples for every additional 100,000 t: 2 additional samples
Dual production	For every batch of single-component feed graded as risk-prone	up to 2,000 t/year: 1 sample > 2,000 to 5,000 t/year: 3 samples > 5,000 to 10,000 t/year: 5 samples ≥ 10,000 to 50,000 t/year: 10 samples ≥ 50,000 to 100,000 t/year: 15 samples ≥100,000 to 200,000 t/year: 20 samples ≥ 200,000 to 300,000 t/year: 25 samples for every additional 100,000 t: 5 additional samples

* Facilities that only produce single-component feed not subject to compulsory labelling can dispense with sampling of the outgoing single-component feed if corresponding test was performed at the incoming goods point.

Yearly minimum number of samples/analyses for incorporation into "VLOG geprüft" quality of single-component feed not subject to compulsory labelling

Area / Business trades in/handles	Sampling at "VLOG geprüft" goods receiving	Samples in "VLOG geprüft" outgoing goods
Only bulk "VLOG geprüft" feed and/or bulk feed not subject to compulsory labelling	For every batch of single-component feed graded as risk-prone	up to 10,000 t/year: 1 sample ≥ 10,000 to 50,000 t/year: 2 samples ≥ 50,000 to 100,000 t/year: 4 samples ≥ 100,000 to 200,000 t/year: 6 samples ≥ 200,000 to 300,000 t/year: 8 samples for every additional 100,000 t: 2 additional samples
Only bulk "VLOG geprüft" feed and bulk feed subject to compulsory labelling, plus, if applicable, bulk feed not subject to compulsory labelling	For every batch of single-component feed graded as risk-prone	up to 2,000 t/year: 1 sample > 2,000 to 5,000 t/year: 3 samples > 5,000 to 10,000 t/year: 5 samples ≥ 10,000 to 50,000 t/year: 10 samples ≥ 50,000 to 100,000 t/year: 15 samples ≥100,000 to 200,000 t/year: 20 samples ≥ 200,000 to 300,000 t/year: 25 samples for every additional 100,000 t: 5 additional samples

C 5.2.1 Test Results

The test results from the self-monitoring system and any resulting (corrective) measures are to be reviewed in the course of the audit. It is the auditor's responsibility to take supplementary samples during the audit on a risk-targeted basis and in suspicious cases. The samples and tests serve to test the self-monitoring system. The results may also be incorporated into the self-monitoring system and thereby reduce the number of samples in the self-monitoring system. Expenses are to be split between the certification body and the certification client.

C 5.3 Declaration on Delivery slip

GMO labelling in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003 must be properly implemented on labels, production and goods shipping documents, specifications, etc.

VLOG-certified feed must be marked by the certified feed business with the wording "VLOG geprüft" and/or the "VLOG geprüft" seal (see Figure 2). When using the "VLOG geprüft" seal, the requirements of Chapter A 1.2.2 must be complied with.

VLOG recommends the following wording for the declaration of non-VLOG-certified feed not subject to compulsory labelling: "The following feed produced and/or distributed by us is not subject to compulsory labelling within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed, and Regulation (EC) no. 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms:…".

C 6 Specific Requirements for Mobile Grinding and Mixing Facilities

VLOG will publish specific requirements for mobile grinding and mixing facilities on its home page by 31 December 2017[5].

[5] Individuals registered on the homepage as users of the Standard (http://www.ohnegentechnik.org/ohne-gentechnik-siegel/registrierung/), VLOG members and licensees of the "Ohne GenTechnik" or "VLOG geprüft" seal will be informed by email.

Part D: Agriculture

In the following part, the specific rules and requirements for the Agriculture Stage and its sub-stages are described.

D 1 Stage Definition and Certification Obligation

The following table defines the requirements for raw materials of animal origin for which a certificate is issued according to the VLOG Standard or which are used in products for which a certification is to be issued according to the VLOG Standard.

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of mandatory certification	Requirements according to the Standard
Animal production: The production or rearing of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.				
	For any agricultural operation that carries out primary production to be labelled as “Ohne Gentechnik” and whose “Ohne Gentechnik” production exceeds the following business sizes: • Apiary: < 50 beehives • Egg-producing operations: < 350 animal spaces • Milk production: annually < 10 cows	For any agricultural operation that carries out primary production to be labelled as “Ohne Gentechnik” label and meets the following business size requirements: • Apiary: < 50 beehives • Egg-producing operations: < 350 animal spaces • Milk production: annually < 10 cows	Yes	D 1 to D 4, if applicable I 3

	For any agricultural operation that carries out primary production to be labelled as "Ohne Gentechnik" and that is a member of a VLOG group (see Part E). From 1/1/2019: For rearers of pullets that sell the animals to aforementioned primary producers and whose "Ohne Gentechnik" compliant feed is to be taken into account for compliance with the minimum conversion feeding period.	For agricultural operations that produce young animals/livestock but do not produce any food and whose "Ohne Gentechnik" feeding can be recognised within the scope of a supplier confirmation (e.g. producers of calves, piglets).	Yes	
Plant production: The cultivation of primary products, including harvesting and foraging.				
Cultivation of feed	For the cultivation of feed used within the operation for the production of food of animal origin with the "Ohne GenTechnik" label.	For the cultivation of feed not used within the operation for the production of food of animal origin with the "Ohne GenTechnik" label.	Yes	D 1 to D 3, D 6, I 3
Cultivation of food/raw materials		For the production of plant-based raw materials/food.	No	

Animal transport/livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transshipping and remaining stationary, until the completion of unloading of the animals at the intended destination.				
	Livestock trade	Applies to animal transport, provided that all of the following three conditions are met: • Commissioning by a VLOG-certified business. • Transport is integrated into the self-monitoring system of the VLOG-certified business. • An agreement is in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard.	Yes	D 1-D 3, D 5

D 2 Details of the Certification Process

D 2.1 Risk Grading

Risk grading by the auditor (see Chapter A 3.9) to be carried out according to the following criteria. In case different results are obtained using the different criteria for risk assessment, the business will be graded as belonging to the highest/strictest risk category.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	Only possible if all of the following criteria are met: • No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present within the facility. • Installations / feeding / equipment / machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.	Feed subject to compulsory labelling, which can be swapped, is present in the business. Grading in Risk Category 1 is only possible if installations / feeding equipment / machines that come into contact with feed subject to compulsory labelling, which can be swapped, are completely segregated from the VLOG operating unit.	Following initial conversion to "Ohne Gentechnik" production (or conversion to "Ohne Gentechnik" production, possibly with a time lag), any feed subject to compulsory labelling, which can be swapped and is handled with the same installations / feeding equipment / machines used for "Ohne Gentechnik" feed production.
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG stall	After the beginning of "Ohne Gentechnik" feeding, no switch to feeding with feed subject to compulsory labelling takes place in the VLOG operating unit/in the VLOG stall.		After initial conversion to "Ohne Gentechnik" feeding, feeding oscillates between "Ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling (e.g. in production systems involving animals whose lifespan is longer than the "Ohne Gentechnik" minimum conversion feeding period).

Criterion enters into effect from 1/8/18: **Certification status of risk-prone feed not subject to compulsory labelling used in "Ohne Gentechnik" production**	Feed and feed supplier are VLOG certified.	Risk-prone feed originating from a VLOG-certified producer; the feed supplier itself (e.g. trader, storehouse) is not VLOG-certified.	Risk-prone feed not originating from a VLOG-certified producer.
Criterion enters into effect from 1/8/18: **Cooperative use of** • **mobile grinding and mixing facilities** • **or stationary grinding and/or mixing facilities of agricultural self-mixers**	Cooperatively used mobile grinding and/or mixing facilities or stationary grinding and/or mixing facilities of agricultural self-mixers r are certified according to the VLOG Standard	Mobile grinding and/or mixing facilities or stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not. Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met: • The facility used is certified according to a recognised quality assurance system (e.g. QS, KAT). • Measures to prevent carryover of GMO are described in the QM manual of the facility operator. • Purges and/or removal of residues are carried out to prevent GMO carryover.	Mobile grinding and/or mixing facilities or stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed/raw materials subject to compulsory labelling and such that is not. Grading into Risk Category 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT). Purges and/or removal of residues are carried out to prevent GMO carryover.

D 2.2 Audit Intervals

Annual routine audits are carried out for individual certification of agricultural operations.

For agricultural group certifications, after initial certification of the VLOG group and/or initial inclusion of an agricultural group member into the agricultural VLOG group, an audit of the agricultural group members is carried out by the certification body according to the audit intervals resulting from the risk category:

- All agricultural group members in Risk Category 0 must be audited by the certification body within 3 years.
- All agricultural group members in Risk Category 1 must be audited by the certification body within 2 years.
- All agricultural group members in Risk Category 2 must be audited annually by the certification body.

The specific rules for group certifications are described in Part E Group Organisation.

D 2.3 KO Requirements

The following KO requirements are determined:

- Traceability System (D 3.3)
- Crisis Management (D 3.7)
- Incoming Goods Inspection (D 4.2)
- Animal Inventory (D 4.4.2)
- Compliance with the Minimum Conversion Feeding Period (D 4.4.3)

D 3 General Requirements

D 3.1 Facility Description

The facility description according to Annex XIII or XIV must be produced and kept up-to-date.

Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents and tests listed therein must be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description must be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

The facility description documents if feed subject to compulsory labelling is also produced, stored, processed or given as feed within a business, or if there is a periodic change between “Ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling. There must be a facility block diagram / sketch pointing out all VLOG stalls including their holding capacities and species kept therein, storage areas for feed requiring labelling, and installations for feed production and feed handling (mixing facilities,

equipment storage, feeding installations, etc.) including all facilities that are not located directly at the farmstead.

D 3.2 Assignment of Responsibilities / Organisational Chart

The facility structure and an organisational chart containing details on responsibilities, and a deputy plan to cover for absence must be available on the premises in written form.

An overview of all persons employed in the operational process of relevance to “Ohne Gentechnik” certification must be compiled. This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

In the case of smaller facilities, this may be done as part of the facility description.

D 3.3 Traceability System (KO)

A traceability system must be installed permitting the instant identification of all products in the business that are related to the “Ohne Gentechnik” labelling process. In addition, it must be possible to trace back within one working day any feed and other products that have left the business, and to compile lists of quantities and evaluations which permit conclusions on goods flows and their plausibility. According to Regulation (EC) No. 178/2002 the following data must be collected for this purpose:

- Information regarding origin
- Creation of batches, if applicable
- Information on delivery date and market participants supplied

D 3.4 Handling of Non-Compliant Products / Positive GMO Test Results

For the event of positive analytical results or other findings regarding a lack of compliance with the “Ohne Gentechnik” requirements, a system of defect handling and labelling / blocking of non-compliant products with appropriate measures must be put in place before goods are shipped.

Positive test results are to be handled according to Annex IV.

In the case of positive tests for non-labelled feeds which are nonetheless clearly subject to compulsory labelling, the requirements of Chapter D 4.4.1 must be complied with.

D 3.5 Staff Training

All employees involved in operational processes relevant for “Ohne Gentechnik” must have comprehensive knowledge of the measures required to safeguard “Ohne Gentechnik” feeding. Instruction / information regarding the “Ohne Gentechnik” requirements and the relevant operating procedures must take place both before they take up their activity and on an ongoing basis, but at least once a year. This takes the form of practical instruction.

These training / instructional sessions must be documented regarding their content, their participants, as well as the training date, the training location, and the instructors.

Small businesses must make sure that all persons involved in operating procedures that are relevant for “Ohne Gentechnik” production have comprehensive knowledge of the measures that are necessary to ensure “Ohne Gentechnik” feeding. If no separate training session is provided, this must be explained in the facility description.

D 3.6 Complaint Management and Goods Recall

Complaints concerning the requirements of the VLOG Standard by clients or other bodies (e.g. local authorities) or deviations within the self-monitoring system must be documented and evaluated appropriately. For this purpose, suitable corrective action, including the determination of responsibilities, must be initiated. If the agricultural operation is part of a group certification, the group organiser must be informed and corrective action coordinated.

If non-compliances are detected in raw materials or animals that are still in the market, a recall system must be in place that must provide for written notification to customers.

D 3.7 Crisis Management (KO)

A crisis management protocol is required only for agricultural operations not included in the group certification.

A crisis management system must be in place and potential dangers analysed. As part of this system, a process is to be in place that prescribes the procedure to follow in the event of a crisis. This can be set forth in the facility description. Emergency numbers / contact details of suppliers and clients must be at hand.

There must be an internal system for blocking the release of incriminated products.

The business must inform its customers as rapidly as possible of any problems related to product specifications, in particular non-conformities relating to “Ohne Gentechnik” which have, had, or could have a defined influence on the process safety and / or legality of the relevant products. This must occur in accordance with the precautionary principle, but is not limited to it.

D 3.8 Corrective Action

The procedure for non-compliances, including the responsibilities, must be described and adequate measures must be taken in the case of complaints concerning “Ohne Gentechnik” production (e.g., customer complaints or positive test results). The effective corrective action is to be recorded and implemented. This applies also to the corrective actions from the last audit.

The process descriptions may be given as part of the facility description or in another form.

In particular, the handling of positive test results must be taken into consideration (see Chapter D 3.4).

D 3.9 Documentation and Retention Period

The records must be easily legible and authentic. They must be kept in such a manner that post facto manipulation is not possible. All delivery slips/records, invoices for operating resources (e.g., for seeds), documents accompanying feed, documentation, orders, declarations, etc. must be retained for a period of at least five years, unless statutory requirements stipulate a longer retention period.

D 3.10 Protecting the Self-Monitoring System

An internal process audit is to be performed once per year. During this audit, the facility description will be checked and updated as appropriate.

D 4 Specific Requirements for Animal-based Production

D 4.1 Ordering feed

For safety's sake, the following procedure is permissible when ordering feed:

Ordering:

To prevent confusion, the agricultural operation must submit feed orders in writing, specifying the animal species / animal category and feed type. Orders must explicitly refer to the fact that the feed is to be used for production of "Ohne Gentechnik" labelled food and must not be subject to compulsory labelling.

Alternatively, it may be contractually agreed with the supplier that all feed supplied must be suitable for production of "Ohne Gentechnik" labelled food and not be subject to compulsory labelling.

Alternatively, the following additional confirmation is to be obtained from the feed supplier on the bill of lading/waybill: "The following feed produced and/or distributed by us is not subject to compulsory labelling within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed, and Regulation (EC) no. 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms:…".

Feed bearing a reference to and / or the "VLOG geprüft" seal may be used without written orders, without additional contractual agreement and without other accompanying documents.

D 4.2 Incoming Goods Inspection (KO)

In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with the "Ohne Gentechnik" seal it is only permissible to use feed which does not bear, or would not have to bear, a label in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003 if this feed were placed in the market. At goods receiving it must be ensured that all feed used for the "Ohne Gentechnik" sector meets these requirements.

Suitable evidence is available for risk-prone feed. This is, first and foremost, the waiver of labelling in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003 on feed and seed labels or accompanying documents.

Within the scope of the incoming goods inspection of VLOG-certified feed

- The bills of lading must be checked for the "VLOG geprüft" label. A complaint is to be issued to the supplier for incomplete bills of lading.
- The certification of the feed producer and/or supplier must be checked periodically, but at least once annually.

In order to ensure traceability at the Agriculture Stage, all delivery slips for purchased feed must be reviewed for completeness of the information provided and filed in chronological order. If mobile mixing and grinding facilities are used, compliance with the requirements must be confirmed by their operators and, if applicable, the removal of residues and/or purges must be recorded.

D 4.3 Sampling and Testing

Risk-targeted sampling and testing of feed for GMO within the scope of the self-monitoring system is to be undertaken according to the following description.

The following requirements for implementing a test plan apply only to agricultural operations not included in the VLOG group certification.

- A test plan must be available on the basis of a risk assessment, meeting at a minimum the requirements described below; it must be implemented according to schedule. The test plan must also describe the sampling procedure (type of samples, sampling locations, name of sampler, creation of reference samples, sample size), sampling frequency, and the test procedure.

Sampling and GMO testing are dispensable if it is not technically possible to analyse the feed for genetic modification.

D 4.3.1 Risk-prone feed

The following feeds are graded as risk-prone for the Agricultural Stage:

1) Single-component feed from plant species such as soy, rapeseed / canola, maize/corn, sugar beet[6], and cotton except:
   - Feed from plant species that are certified in accordance with the VLOG Standard or a recognised VLOG-equivalent standard; and / or
   - Feed from plant species that directly originate from a producer from a cultivation country where the cultivation of genetically modified plants is prohibited and the feeds and raw materials were neither processed by third parties nor transported by a commercial shipper.
2) Compound feed produced from one or more of the single-component feeds mentioned in 1) except:
   - Compound feed that is certified in accordance with the VLOG Standard or a recognised VLOG-equivalent standard

D 4.3.2 Sampling Frequency and Retention of Reference Samples:

- At every delivery of risk-prone single-component and compound feed, sampling must be carried out, including documentation. This is to be done jointly by the supplier and customer; exceptions in justified cases may be approved in consultation with VLOG
- If mobile grinding and mixing facilities are used, samples of compound feed must be collected according to the provisions in Chapter D 4.6.1.
- If a VLOG operating unit / VLOG stall regularly switches between “Ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling, sampling must be carried out after every switching to “Ohne Gentechnik” feeding.

Sampling of sacked goods (including tamper-resistant and sealed Big Bags) may be dispensed with.

The last three samples taken – but not less than the samples of the past two months – must be retained so that they are accessible to the auditor.

[6] Translation mistake: was sugar cane in version of 07.11.18

Area / Risk category	Feed delivery*
Sample material	Risk-prone single-component and compound feed
0	Each delivery
1	Each delivery
2	Each delivery

*Farmers receiving risk-prone feed material exclusively in VLOG-certified quality or in accordance with a VLOG-recognised equivalent standard are exempt from the requirement of drawing reference samples.

D 4.3.3 Test Frequency

At least one test result according to the VLOG Standard in each audit interval must come from the production system of the agricultural operation, unless the operation receives risk-prone feed material exclusively of VLOG-certified quality that is declared as "VLOG geprüft" on the documents accompanying the goods. If an operating unit regularly switches between "Ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling, sampling and GMO tests must be carried out after every switch to "Ohne Gentechnik" feeding.

If, for the production of "Ohne Gentechnik" food, only

- VLOG-certified risk-prone compound feed or feed certified according to a VLOG-recognised equivalent standard, and/or
- VLOG-certified risk-prone single-component feed or feed certified according to a VLOG-recognised equivalent standard

is fed to livestock, the generally required sampling and testing of feed materials for GMOs may be dispensed with. If risk-prone (single) feed from non-VLOG-certified producers is (also) used in producing "Ohne Gentechnik" food products, the obligation to draw samples, store reference samples, and test the products for GMOs as part of the self-monitoring system applies.

Samples analysed by VLOG-recognised system participants or those certified according to an equivalent VLOG-recognised standard, (group organisers, producers of compound or single-component feed) may be "factored" in agricultural operations both in the test plan as well as in the test plan of the group organisation (e.g. dairy, egg-packing facility). However, it must be the feed batch actually used.

If collective samples of feed are analysed, the results may not be factored as test results pertaining to individual operations. For each agricultural operation at least one test result that refers to a specific delivery of risk-prone single-component or compound feeds is to be produced in each auditing interval.

The auditor is authorised to take additional samples and / or carry out additional GMO tests on a risk-targeted basis or in suspicious cases. When assessing a risk, the following points are to be taken into consideration:

- Use of mobile grinding and compounding facilities
- Procurement of risk-prone feed from a producer not certified in accordance with the VLOG Standard (higher risk).
- Regular switching between "Ohne Gentechnik" feeding and feeding with feed labelled in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003 in one operating unit.

The samples and tests serve to test the self-monitoring system. The results may also be incorporated into the self-monitoring system and thereby reduce the number of samples in the self-monitoring system. Expenses are to be split between the certification body and the certification client.

D 4.3.4 Test Results

The test results from the self-monitoring system and any resulting (corrective) measures are to be reviewed in the course of the audit. It is the auditor's responsibility to take supplementary samples during the audit on a risk-targeted basis.

D 4.4 Self-monitoring Concept

D 4.4.1 "Ohne Gentechnik"-Compliant Feeding

In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with the "Ohne GenTechnik" seal it is only permissible to use such feed which does not bear or would not have to bear a label in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003 if this feed were placed in the market.

Before converting an agricultural production unit to GMO-free feeding, a risk analysis of the facility's individual processes and evaluation of the related risks must be performed, with at least the following sources of contamination to be taken into account:

- Entry through feed subject to compulsory labelling
- Entry through feed from the grower's own cultivation;
- Carryover and commingling through third parties;
- Carryover within the business (e.g., via equipment or personnel).

Detailed measures tailored to the business in question must be documented and performed on the basis of this identification of the various sources of carryover and contamination. These measures must preclude the possibility of future contamination by, and carryover from, feed requiring a GMO declaration.

In all cases, a thorough clean-up of the facility is necessary at the beginning of the conversion to GMO-free feeding. This concerns all equipment, storage areas, installations, mixing installations, vehicles, etc., which come into contact with feeds.

If in addition to the GMO-free feed other animals are fed in an agricultural operation with feed that must be labelled or which is grown in the vicinity of genetically modified crops, there is a strongly increased risk of carryover through residual feed, shared use of equipment, dust, etc. In this case, the measures taken for their avoidance must be documented.

If a VLOG operating unit / a VLOG stable regularly switches between "Ohne Gentechnik" feeding and feeding with feed that requires labelling, the measures specified in accordance with the procedure described above must be performed and documented before the start of non-GMO feeding in accordance with the above procedure. It must also be documented where any residual quantities of feed that requires labelling were moved to. The effectiveness of the residue removal, cleaning of installations, and any other measures carried out must be verified by sampling / GMO tests after every switching to "Ohne Gentechnik" feeding.

If it is determined that an animal was fed with feed labelled in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003 during or after the minimum conversion period, the minimum conversion period must start anew for this animal. In case the feed was subject to labelling obligations but was not

labelled accordingly (e.g. due to an unintended carryover), the residual contaminated feed must be replaced or used outside the area dedicated to “Ohne Gentechnik” production once the erroneous labelling becomes known. Food which has already been marketed (e.g. milk with “Ohne Gentechnik” labelling) needs not be recalled.

If a serious infraction of non-GMO feeding invalidating “Ohne Gentechnik” labelling occurred through faulty labelling of feed, the minimum feeding conversion period must start anew, if applicable, shortened according to specific circumstances. The severity of the infraction must be examined in each individual case by the respective certification bodies; it is influenced in particular by the following factors:

- The farmer was aware that the feed should have been labelled according to Regulations (EC) No. 1829/2003 and No. 1830/2003
- Lack of due diligence at reception of feed
- Quantity of the wrongly declared feed that was actually fed
- GMO portion in the feed
- Time during which the wrongly declared feed was fed.

A legal opinion on behalf of VLOG offers additional orientation for businesses and the certification bodies concerning the decision as to whether a new start is required (Legal Opinion dated 23/11/2015 http://www.ohnegentechnik.org/downloads/ - available in German only).

D 4.4.2 Animal Inventory (KO)

All categories of animal that are tended in the facility for the production of food are to be listed. In addition, it must be established whether these animals are fed in compliance with the “Ohne Gentechnik” Standard or not.

D 4.4.3 Compliance with Minimum Feeding Conversion Periods (KO)

Before "Ohne Gentechnik" labelling of food of animal origin (meat, milk, eggs), exclusively "Ohne Gentechnik" feeding must be complied with for the period defined in the EC Genetic Engineering Implementation Act (EGGenTDurchfG) for each animal species and intended use.

Animal species	**Period**
Equids and cattle (including water buffaloes and bison species) for meat production	Twelve months and in any case at least three quarters of their life
Small ruminants	six months
Pigs	four months
Milk-producing animals	three months
Poultry intended for meat production put in stalls before the age of 3 days[7]	ten weeks
Poultry for egg production	six weeks

Source: EGGenTDurchfG, most recently amended by Art. 58 V of 31 August 2015 | 1474

Animal species not listed here must be fed with GMO-free feed from the time of birth / hatching.

Ensuring the aforementioned minimum feeding conversion periods within the business is to be verified by means of the feed list (see Chapter D 4.4.4) and feed bills of lading / cultivation records.

When additional animals are purchased, the minimum conversion feeding periods must be observed and the requirements met. The procedure is described accordingly.
When new animals are bought from an owner who fed the animals in compliance with the "Ohne Gentechnik" Standard, this period may be factored into the minimum conversion period, provided there is written confirmation from the previous owner. The confirmation must contain the date from which the animals were verifiably consistently fed with feed not subject to compulsory labelling.

Egg-producing operations:

As of 01/01/2019, "Ohne Gentechnik" compliant feeding by pullet rearers may only be considered if they are VLOG-certified for pullet rearing or a group member of a VLOG group. As of 01/01/2019, if the pullet rearer is not VLOG-certified, the minimum feeding conversion period of not less than 6 weeks must be complied with in a VLOG egg-producing operation before the eggs may be labelled "Ohne Gentechnik".

D 4.4.4 Feed Lists

The agricultural operation is to keep a feed list in which the feed used, its origin as well as the intended purpose (animal species / animal category) are specified.

Note:

[7] The minimum feeding conversion period for poultry for meat production in the table given above is equivalent to a flat period of ten weeks prior to slaughter, not including the first three days of life.

Based on this list, further considerations concerning the protection of “Ohne Gentechnik” feeding are required:

- It must be verified and ensured that corresponding documentation exists for each delivery of feed, attesting that this feed is not subject to compulsory labelling.
- Identification of overlaps in the purpose of feed for different animal species. This is decisive especially when feeding with feed not subject to compulsory labelling occurs at the agricultural operation simultaneously with feed that is subject to compulsory labelling.

The feed list must initially be drawn up within the scope of a first assessment. After that it must be kept up to date by adding new feeds and new suppliers, and by deleting those that no longer exist. However, the latter may only be done once the respective feed has been fully consumed and is no longer present on the premises. Additions and deletions must be noted with the date of the first purchase or the date of the last consumption. All self-produced feed must also be entered in the feed list.

An alternative for small businesses is a feed list realised by chronologically filing invoices and delivery slips.

D 4.4.5 Feed Rations

The feed rations must be listed for all animal species and animal categories for “Ohne Gentechnik” production. For this purpose, an individual overview must be compiled for each animal species. In case there are different feed rations depending on the phase of life (e.g. dry cow treatment), season (grazing season / indoor husbandry in winter), etc., they must be listed separately.

The feed components must be named precisely, e.g., the exact designation of the type of feed and the producer of a feed instead of simply “milk performance feed”, or “rapeseed / canola meal” instead of simply “rapeseed”. The declarations, in particular for compound feed, must be filed together with the records on feed rations.

D 4.5 Segregation of Goods Flows / Exclusion of Carryover from GMO Feed, Commingling and Swapping

Parallel feeding of feed subject to compulsory labelling and feed not subject to such labelling for “Ohne Gentechnik” production of the same animal category is not permissible at the agricultural operation.

- A division into, e.g., cattle and pigs, and dairy cows and calves, would be permissible. There is an exception for the use of non-swappable feed (e.g. special feed for pullets and laying hens).
- Fully segregated operating units where storage and handling of feed are also fully segregated, are another exemption from the rule.

The presence of feed the suitability of which for “Ohne Gentechnik” feeding is not ensured is permissible if the intended use thereof and the segregation from areas dedicated to “Ohne Gentechnik” production is clearly documented. For example, conventional complete or supplementary feed for breeding sows in an operation where dairy cattle are fed “Ohne Gentechnik” feed does not pose a problem.

In the case of swappable feeds whose purpose is not clearly defined or which can be used in several ways for a number of animal categories (e.g. soy bean meal as single-component feed), the parallel use of feed subject to compulsory labelling and feed that is not subject to such labelling for “Ohne Gentechnik” production is only permissible if the feed is stored and used in segregated agricultural operations / operating units. In addition, the respective feed must be labelled with the intended use (class of animal category to which the feed is intended to be fed).

It must be ensured in a traceable manner that at no time feed that requires labelling can make its way into the flow of feeds intended for the production of "Ohne Gentechnik" food. For this purpose, the goods flows must be segregated spatially, temporally, and compliance must be documented by clear and seamless labelling of all feeds.

Simultaneous storage is only permissible if the goods are spatially segregated.

In the case of temporal segregation, it must be ensured by suitable process steps that any carryover of GMO is reduced to a technically unavoidable minimum. For example:

- Vehicles must be verifiably dry cleaned after having transported bulk feed subject to compulsory labelling.
- Where there is regular switching between "Ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling within a VLOG operating unit/a VLOG stable, the measures in Chapter D 4.4.1 must be implemented and documented.

If the business simultaneously produces or handles food it produces itself that is suitable for "Ohne Gentechnik" labelling, and food not suitable for "Ohne Gentechnik" labelling, it must be ensured by appropriate measures that no commingling or swapping of food of the different qualities occurs.

Agricultural self-mixers with their own stationary grinding and / or mixing facility which use and mix in the same facility both feed subject to compulsory labelling and feed for "Ohne Gentechnik" production must take suitable measures to prevent carryover of genetically modified feed. The measures are to be recorded and their efficiency to be examined by means of routine tests. The tests may be commissioned by the self-mixer or the auditor.

The risk-targeted process steps (e.g., transport and mixing processes) must be documented for each operation with separate proof of adequate spatial and temporal separation or logistical measures and their efficacy reviewed as part of the self-monitoring process. Furthermore, in the case of temporary segregation in the handling of feed subject to compulsory labelling and feed not subject to such labelling for "Ohne Gentechnik" production intended for production of "Ohne Gentechnik" food, the effectiveness of the measures must be proved by means of representative testing results.

D 4.6 Joint Use of Machines, Facilities / External Service Providers

- If machines/facilities for feed cultivation, feed processing and production are used jointly by several agricultural operations, and/or
- Tasks are outsourced to external service providers,

this is to be taken into account in the self-monitoring concept / risk analysis of the business, and corresponding process steps and measures to prevent GMO carryover are to be established. An agreement regarding compliance with the agreed measures and/or compliance with the requirements of the VLOG Standard is to be made with the joint machine users and/or commissioned businesses.

D 4.6.1 Joint Use of Mobile Grinding and Mixing Facilities

By 31 December 2017 VLOG will publish on its homepage specific requirements for agricultural operations that jointly use mobile grinding and mixing facilities in "Ohne Gentechnik" production[8].

[8] Users registered on the homepage of the Standard (http://www.ohnegentechnik.org/ohne-gentechnik-siegel/registrierung/), VLOG members and licensees of the "Ohne GenTechnik" or "VLOG geprüft" seal will be informed by email.

D 4.7 Inspection of Outgoing Goods / Declaration on Delivery Slip

Employees must be aware of the GMO status of the feed and the conversion status of the individual animals / fattening batches at all stages, from receiving the feed through animal production to delivery / transport of the animal products / animals.

It is to be ensured that only products fully meeting the legal requirements for "Ohne Gentechnik" labelling leave the business as such. Compliance with minimum feed conversion periods after the purchase of new livestock or conversion to new feed must be strictly observed.

Marking in accordance with the EGGenTDurchfG must be ensured on all documents accompanying the goods, labels, etc. For advertising and marketing, only the statement "Ohne Gentechnik" may be used, and care must be taken to comply with the statutory requirements regarding the "Ohne Gentechnik" declaration, taking into account Section 11 (1) (3) LFGB.

VLOG-certified goods must be labelled as "VLOG" goods on all bills of lading. If no waybills / bills of lading are produced due to the nature of the system (e.g. milk collection), an unequivocal contractual regulation is to be made concerning delivery.

D 5 Specific Requirements for Animal Transport / Livestock Trade

D 5.1 Incoming Goods Inspection (KO)

At goods receiving it must be ensured that all VLOG animals meet the following requirements.

- "VLOG" quality is to be confirmed for every delivery by the upstream supplier on the waybills / animal transport documents for each individual animal and/or group.
- For every delivery operation, the VLOG certification and/or incorporation into a group certification (written verification by the certification body of the group organisation) for the area of applicability of the animal species/animal category is to be verified in a risk-targeted manner.

The requirements according to Chapter D 4.1 and D 4.2 apply to the incoming goods procedure for "Ohne Gentechnik" feed. There is no obligation to carry out sampling at the time of delivery, retention of reference samples or routine tests.

D 5.2 Self-Monitoring Concept/Risk Analysis

The self-monitoring concept including the risk analysis must take into consideration the required segregated handling of

- VLOG-certified animals from animals of other qualities
- - if applicable – segregated handling of feed subject to compulsory labelling and feed that is not, as well as potential sources of contamination and entry.

D 5.2.1 Animal Inventory (KO)

All VLOG animals/animal categories present within the business are to be taken into account and it must be determined whether the feeding of these animals is "Ohne Gentechnik" compliant or whether no feeding takes place.

D 5.2.2 "Ohne Gentechnik" Compliant Feeding

If feeding of the VLOG animals takes place, compliance with the following VLOG requirements is to be verifiably ensured:

- Suitability/permissibility of the feed for "Ohne Gentechnik" production (see Chapter D 4.4.1).
- Documentation of feed used via feed list (see Chapter D 4.4.4)
- Documentation of feed rations (see Chapter D 4.4.5).

D 5.3 Segregation of Goods Flows / Exclusion of Commingling and Swapping

The risk-targeted process steps for ensuring the following requirements are to be documented for each operation with a separate proof of adequate spatial, temporal or logistical measures and their efficacy reviewed as part of the self-monitoring process.

D 5.3.1 VLOG Animals

It must be verifiably ensured that VLOG animals are always conveyed and/or transported separately from animals of other qualities:

- Animals / animal categories with identification of individual animals (e.g., cattle ear tags with a unique ID number for each animal): the unique individual animal identification serves as sufficient verification of segregation. When accepting animals, the animal identification must be checked; only properly identified animals may be accepted.
- Animals / animal categories with farm identification (e.g., pig ear tags specifying the agricultural operation's VVVO number):
  - If only animals that are verifiably VLOG animals are accepted with a transport from an operation, the operation identification of the animals serves as sufficient verification of segregation.
  - If both VLOG animals as well as animals of other qualities are accepted with a transport from an operation, the different groups must be verifiably segregated during transport / conveyance. The segregation measures must be documented in the transport documents.

D 5.3.2 "Ohne Gentechnik" Feed

It must be ensured in a traceable manner that at no time feed that requires labelling can make its way into the flow of feeds for "Ohne Gentechnik" production. For this purpose, the goods flow must be segregated spatially, temporally, and compliance documented by clear and seamless labelling of all products.

Simultaneous storage of GMO and non-GMO material is only permissible if they are spatially segregated.

In the case of temporal segregation, it must be ensured by suitable process steps that any carryover of GMO is reduced to a technically unavoidable minimum.

D 5.4 Commissioning External Service Providers

Commissioning of external service providers is to be done according to the requirements in Chapter A 3.2.1

D 5.5 Inspection of Outgoing Goods / Declaration on Delivery Slip

All employees must be aware of the VLOG status of the individual animals, from acceptance through conveyance / transport, to final delivery.

VLOG-certified animals are to be declared as such on the delivery documents individually and/or by group.

D 6 Specific Requirements for Plant-based Feed Production

D 6.1 Incoming Goods Inspection (KO)

At goods receiving it must be ensured that all seeds and seed stock for the production of feed to be used within the business is GMO-free. To do so, the seed documents / declarations must be inspected for the absence of a label according to Directive 98/95/EC.

The feeds produced internally must be documented in the feed list (see Chapter D 4.4.4).

D 6.2 Segregation of Goods Flows / Exclusion of Commingling and Swapping

GMO carryover from GMO cultivation and/or GMO experimental releases into feed produced internally must be prevented. For this purpose, it must be periodically verified whether GMO cultivation or GMO experimental releases are taking place in the immediate vicinity of the fields and whether this is affecting the operation's own crops. If this is the case, corresponding cultivation distances must be complied with.

The risk-targeted process steps (e.g. transport and mixing processes) must be documented for each operation with a separate proof of adequate spatial, temporal or logistical measures and their efficacy reviewed as part of the self-monitoring process.

Part E: Group Organisation

In the following part of the Standard, the group certification process in agriculture and the requirements and specifications for group organisation in agriculture are described.

E 1 Definition and Certification Obligation

A VLOG agricultural group is a combination of agricultural operations (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture.

The requirements for the Agriculture Stage (Chapter D 3) must apply to agricultural group members. Additionally, the requirements in Chapter E 2.4 must apply to the agricultural group organiser. The audits review whether all requirements have been met by the agricultural group organiser and the agricultural group members.

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of mandatory certification	Requirements according to the Standard
Agricultural group organiser, hereinafter group organiser: Business in a VLOG agricultural group having responsibility for a self-monitoring system covering agricultural group members and, for the production of food products of animal origin, also including PCR tests of the feed employed. In VLOG agricultural group certification, certification is done through the group organiser, i.e. the group organiser receives the certification for the VLOG agricultural group.				
	Food of animal origin	Plant-based food	No	E 2, E 2.4
Agricultural group member, hereinafter group member: Agricultural operation which is contractually integrated into a VLOG agricultural group.				
	For the production and processing of food of animal origin.	For the production of plant-based food.	No	D 2 to D 5, G 2 to G 3

E 2 Details of the Certification Process

E 2.1 Conditions and Requirements for the Certification

- Contract between the group organiser and a VLOG-recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG[9]
- A group member may only be a member of one VLOG group for a specific product area (e.g. milk production). If a group member produces animals/animal products for different product sectors (e.g. milk and meat), the business may be a group member of different VLOG groups for each product segment. If a business is a member of a VLOG group, independent certification according to the VLOG Standard is not permissible for this area of applicability.
- "Ohne Gentechnik" labelling of food products of a group member is only permissible once this group member has been reported to the certification body in accordance with the requirements in Chapter E 2.2.1, an initial collection of group member data has been done by the group organiser, if necessary, an audit of the group member has been done, if necessary, and the group member has been accepted by the certification body for the VLOG group.
- If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with "Ohne Gentechnik" is not permitted for all members of the VLOG group.
- The continued marketing of "Ohne Gentechnik"-labelled food by the group is permitted if individual group members are excluded from the group. In this case, only the excluded former group members are prohibited from marketing food labelled as "Ohne Gentechnik".
- The group organiser is responsible for monitoring the implementation of corrective measures in the event of deviations by group members.

E 2.2 Process

Group certification in agriculture is to be performed in accordance with the following steps: (see Chapter E 2.2.1 to E 2.2.5)

- Application for certification made to a VLOG-recognized certification body and submission of the group description (see Chapter E 3.1), including risk grading.
- If applicable, initial collection of group member data by the group organiser
- Audit planning with the group organiser (scope, date / time and duration of audit)
- Auditing of the group organiser and the group members by the auditor in accordance with Chapter A 3.7, including evaluation of the requirements, verification of risk grading
- Audit evaluation/review by the certification body including"
    - Confirmation/correction of the audit result and correction of the risk grading, if applicable, and
    - Confirmation of the approved group members

[9] Known as "certification agreement" until 20 June 2017

- Certification of the VLOG agricultural group

E 2.2.1 Application for Certification, Submission of Group Description

The group organiser applies to the certification body for group certification in accordance with the VLOG Standard, and submits the group description (see Chapter E 3.1).

A complete agricultural facility description must be submitted for each group member, including plans, organisation chart, process descriptions, etc.

The group organiser must also determine the basis on which the VLOG initial certification and the future approval of additional group members will be carried out

- Initial collection of group member data by the group organiser, together with audits by the certification body at the group organiser and at 25% of the group members (see Chapter E 2.2.2).

  or

- Audit of the group organiser and all group members by the certification body (see Chapter E 2.2.3)

The chosen initial certification procedure is also to be used for approval of new group members of a VLOG agricultural group. The certification body will subsequently update the list of members (see Chapter E 2.2.4).

E 2.2.2 Initial Certification Based on Initial Data Collection by the Group Organiser

The group organiser performs the initial collection of data from all group members, i.e. on-site self-monitoring on the basis of the VLOG checklists by demonstrably competent personnel of the group organiser, and thereby verifies the information in the facility descriptions of the individual group members. These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.

On the basis of these initial data collections, the group organiser is to perform a risk grading of all group members according to the requirements in Chapter D 2.1 and subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories for each group member.

The certification body reviews and evaluates the group description and the facility descriptions of all group members and the group organiser. In case information or documents are missing or defects are identified, the group organiser is to be informed. Once all information/documents are complete, the certification body is to verify the results of the initial data collection by the group organiser for at least 25% of the group members by performing its own initial audits. The certification body is responsible for ensuring a balanced distribution of the audits of the group members, taking into account the risk grading of the group organiser and e.g. size of the facility and organisation, geographic location, feed supplier, etc. If the certification body considers it necessary, it may also audit more than 25% of the group members.

The certification body must then compare the results of the initial data collections with its own results and ensure that there are no discrepancies. If necessary, it will initiate whatever measures may be required. The certification body has the right not to accept the data collected by the group organiser and to conduct an audit of all group members. Such a decision must be properly substantiated in detail.

The certification body must also perform an initial audit of the group organiser; this is generally done before the audits of the group members.

Eventually, the certification body is to verify the grading of the group members into risk categories. The audit intervals of each group member for the coming audit period will be based on this grading.

The initial certification of the VLOG group will be based on the initial data collections and the audits by the certification body of the group organiser and the group members; if necessary with follow-up audits.

E.2.2.3 Initial Certification on the Basis of 100% Audits by the Certification Body

Alternatively, all audits are to be performed by the certification body:

The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body then performs VLOG audits in accordance with Chapter A 3.7 at the group organiser and all group members, such audits being the basis for the verification of the risk category grading and the decision on certification. The audit of the group organiser is generally done before the audits of the group members.

E 2.2.4 Certificate Issuance / Updating of the Members List

The VLOG certificate will be issued for the VLOG agricultural group and must contain the company name of the group organiser. The group organiser is also to receive a list of members from the certification body (a list of the group members approved by the certification body for the VLOG agricultural group).

In the case of agricultural group certifications, the member list must include for each group member:

- The defined risk category and
- The last routine audit date.
- For egg-laying businesses also the print numbers.

The group organiser must promptly report any changes to the certification body.

E 2.2.5 Audit Report Distribution

For each audit carried out, the group organiser and/or the audited group member are to receive an audit report from the certification body including any deviations found and measures to be implemented. The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

E 2.3 Follow-up Certification and Monitoring/Audit Intervals

The group organiser will be responsible for compliance with the audit dates and for monitoring the implementation of corrective measures in the event of deviations by group members.

In the case of agricultural group certifications, the certification body is to perform an audit of the group organiser every year; for the group members, audits at the intervals specified for the corresponding risk category. The audit interval commences as of the date the certificate is first issued.

- The following audit intervals apply for the respective risk categories: All group members in Risk Category 0 must be audited by the certification body within 3 years.
- All group members in Risk Category 1 must be audited by the certification body within 2 years.
- All group members in Risk Category 2 must be audited annually by the certification body.

E 2.4 KO Requirements

The following KO requirements have been laid down:

- Contractually Binding of the Group Members (E 3.2)
- Self-monitoring System (E 3.4)
- Handling Deviations/Corrective Action (E 3.7)
- Crisis Management and Informing Clients (E 3.8)

E 3 Requirements for Group Organisers

E 3.1 Description of the Group

When applying for VLOG certification, the group organiser must submit a description of the group to the certification body. Thereafter, the description must be kept up to date by the group organiser, and changes relevant to certification must be promptly reported to the certification body.

The description of the group must contain/provide:

- A list of the group members and a description of their activities
- A list and description of the activities of the subcontractors / contract processors / outsourced processes, which are integrated into the VLOG group, including the persons in charge and their contact data
- The persons in charge of group certification for the group organiser, including contact data

List of Members and Updating

The updated list of members for group certification is on file; it must at least contain the following information for each group member

- Address, official authorisation number, contact person and contact data
- The defined risk category
- The last routine audit date
- For egg-laying businesses also the print numbers.

Changes to the list of members must be promptly reported by the group organiser to the certification body.

At the request of VLOG, the group organiser must promptly send the current list of members to VLOG.

The group organiser is responsible for the facility descriptions of the group members and for keeping them up to date. If there are internal changes to the business, the group organiser must promptly inform the certification body. The certification body is responsible for deciding whether additional audits must be performed outside the regular intervals.

E 3.2 Contractual Binding of the Group Members (KO)

The group members must be bound to the group organiser by a contract / participation statement requiring compliance with the VLOG Standard for the respective stage and with the requirements and obligations of the individual group's self-monitoring system.

E 3.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body with auditing the group members,

- The group organiser must describe the scope of responsibility of the various certification bodies (e.g. which certification body will audit which group members/member groups)
- The groups must be organised such that each certification body independently audits a respective group or its area of responsibility.
- The certification body must also audit the group organiser's compliance with the requirements in the determined area of responsibility.
- The certification body is to issue one certificate depending on the area of responsibility (e.g., for the group it deals with).
- The group organiser is responsible for ensuring that all activities necessary for certification be performed.
- The rules for group certification must always be applied; this also applies for audit intervals etc.

E 3.4 Self-monitoring System (KO)

A self-monitoring system is to be in place, including risk analysis of the group organiser, which covers all group members as well as their processes and types of documentation.

The self-monitoring system includes at least:

- The processes regarding the necessary segregated handling of products with and without "Ohne Gentechnik" by group members and adjoining stages, and possible commingling and entry
- The necessary GMO tests per stage under this VLOG Standard, including their evaluation for the group members (see E 3.5)

There must be an annual review of the self-monitoring system, including a review of the group description, e.g. as part of an internal audit.

E 3.5 Implementation of the Requirements for Sampling and Testing

The group organiser must develop a sampling and test plan for the group members and ensure compliance with it. In so doing, the different group members' production/process technologies will be taken into consideration.

If collective feed samples are analysed, the results may not be factored as test results pertaining to individual operations. For each agricultural group member, at least one test result that refers to a specific delivery of risk-prone single-component or compound feeds is to be produced for each auditing interval.

Evaluation of the analytical data

The group organiser is responsible for collecting the test results of the group members, and evaluates these at least once per year. These tests must be conducted for each supplier. The suppliers must be evaluated by the group organiser based on the results of the tests and, if necessary, risk-oriented measures must be derived from this for the group members.

Dealing with positive test results

In the event of positive GMO test results, the group organiser must derive (corrective) action in accordance with Annex IV and Chapter E 3.7.

E 3.6 Training of Group Members

The employees of the group organiser who are in direct contact with “Ohne Gentechnik” production or “Ohne Gentechnik” products (e.g. organisations, QM, procurement, contact persons for VLOG) must be trained before starting work and at least once a year thereafter. The lecturers and authors of the training sessions, the contents and the training participants must be documented.

The group organiser is also obligated to transmit to the group members all relevant requirements and information related to “Ohne Gentechnik” production. Communication of the information is to be documented.

E 3.7 Handling Deviations / Corrective Action (KO)

The group organiser must have a system in place for handling deviations (identified by the group organiser or auditor) and complaints by regulatory authorities. This includes, at a minimum, requirements for regular evaluation of such events, the introduction of corrective measures, the monitoring of the implementation of the measures and their effectiveness, and documentation.

E 3.8 Crisis Management and Customer Information (KO)

A crisis management system must be in place and potential dangers analysed. This includes, at a minimum, a description of the actions to be taken in the event of a crisis, the assignment of responsibilities, and availability during and outside of normal business hours (emergency contact numbers/contact information of the suppliers and customers).

In the event of positive test results or other findings regarding a lack of compliance with “Ohne Gentechnik” requirements, a system for labelling/blocking of non-compliant products with appropriate measures must be installed and documented

In the event of deviations (non-marketability) affecting products that are still on the market, the crisis management system must include instructions for the immediate information in writing and by telephone of the customers, as well goods recall measures.

E 3.9 Documentation and Retention Periods

All documents (e.g. delivery slips, supplier evaluations, training documents, etc.) in connection with the group certification and “Ohne Gentechnik” labelling must be retained for at least two years, unless a longer retention period is required by law.

Part F: Food

In the following part, the specific rules and requirements for the Food Stage and its sub-stages are described.

F 1 Stage Definition and Certification Obligation

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of mandatory certification	Requirements according to the Standard
Preparation of food: Preparation comprises sorting and labelling unprocessed products under Regulation (EC) No. 852/2004 as well as the activities referred to in Art. 2 (1) n) of Regulation (EC) No. 852/2004. **Food processing:** Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding or a combination of these various processes (Regulation (EC) No. 852/2004).				
Food of animal origin/ingredients	For processing/preparing/packaging products of animal origin up to the Packaging Stage in end consumer packaging when products of animal origin are to be labelled “Ohne Gentechnik”.	Not relevant.	No	F 1 to F 2.3, F 5, I 3 G 2 to G 3

	For the retail trade, when preparation occurs in outlets, and bulk goods of animal origin are to be labelled "Ohne Gentechnik" (separate Standard Component G).	Not relevant.	No	
Plant-based food/ingredients	For plant-based products which are to be labelled "Ohne Gentechnik" and for which all of the following two criteria have been met: • The preparation/processing is done outside of Germany. • They consist of plant-based ingredients for whose species there is a GMO cultivation authorisation in a given country in the world.	Not relevant	Yes	F 1- F 2.3, F 4, I 3
	For risk-prone plant-based products which are to be labelled as "Ohne Gentechnik" and which are produced with plant-based ingredients for which there is a plausible risk of carryover/appearance of unapproved GMO variants (see Chapter F 5).	Not relevant.	Yes	F 1-F 2.3, F 5, I 3

Transport: Transport is the conveyance of food from one place to another.				
	See Part B Logistics	See Part B Logistics	See Part B Logistics	F 1-F 5, B 1-B 4, I 3
Trade: All activities whereby food is sold and resold, i.e. is not produced, including import and drop-shipping, including import and drop shipping.				
	See Part B Logistics	See Part B Logistics	See Part B Logistics	F 1-F 5, B 1-B 3, B 5, I 3

F 2 Details of the Certification Process

F 2.1 Risk Grading

F 2.1.1 Risk Category 0

- There is no or only very low risk.
- As a matter of principle, businesses that process or store swappable GMOs on their premises cannot be graded as Risk Category 0.

F 2.1.2 Risk Category 1

- There is a medium risk.
- Businesses and process steps with clear spatial segregation in the processing of products for which "Ohne Gentechnik" labelling would be permissible and such products that do not meet the requirements for "Ohne Gentechnik" certification.

F 2.1.3 Risk Category 2

- High risk of commingling GMO-free raw materials with such containing GMOs.
- Businesses and process steps without spatial but with temporal segregation in the processing of products for which "Ohne Gentechnik" labelling would be permissible and such products that do not meet the requirements for "Ohne Gentechnik" certification
- Test results from the audit period under consideration have indicated that the threshold value of 0.1% GMO per ingredient was exceeded; this resulted from the business' failing to take measures to avoid carryover.

F 2.2 Audit Intervals

Routine audits are to be carried out annually.

F 2.3 KO Requirements

The following KO requirements have been laid down:

Self-Monitoring Concept/Risk Analysis (F 3.3)

Incoming Goods Inspection (F 3.5)

Outgoing Goods Inspection (F 3.7)

Traceability System (F 3.8)

Handling of Non-Compliant Products (F 3.9)

Crisis Management (F 3.12)

F 3 General Requirements

F 3.1 Facility Description

The facility description according to Annex XVII is to be produced and kept up to date.

Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents and tests listed therein must be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

At the latest by the next audit, an updated facility description is to be submitted. A report or communication to the certification body is only required in the case of material changes relating to the risk assessment.

F 3.2 Assignment of Responsibilities / Organisational Chart

The facility structure and an organisational chart containing details on responsibilities, and a deputy plan to cover for absence must be available on the premises.

An overview of all persons employed in the operational process of relevance to “Ohne Gentechnik” certification must be compiled. This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

F 3.3 Self-Monitoring Concept / Risk Analysis (KO)

The self-monitoring concept of the food processing business, including a risk analysis, must take into consideration the required segregated handling of conventional and “Ohne Gentechnik” products, including re-working as well as any possibilities of contamination and introduction of GMOs. Preventative, monitoring and controlling measures based on the HACCP must be implemented concerning the correctness of the “Ohne Gentechnik” claim.

In addition, the risk assessment must include evaluating the use of aromas, enzymes, microorganism cultures, additives, auxiliary substances and other feed ingredients on the basis of certificates presented by the suppliers.

A template of a correct certificate confirming the GMO-free status of a product is included in this Standard, see Annex I.

F 3.4 Agents of Outside Service Providers

If the business awards tasks to outside service providers, such tasks are to be viewed as part of the business’s self-monitoring concept/risk analysis, and an agreement must be entered into with the provider requiring it to comply with the respective requirements of the VLOG Standard.

F 3.5 Incoming Goods Inspection (KO)

At goods receiving it must be ensured that all raw materials, food, additives and auxiliary substances that are used in the production/processing/trading of products with "Ohne Gentechnik" labelling meet the requirements of Chapters A 1.3.1, A 1.3.2 and A 1.4.

As part of the incoming goods inspection of VLOG certified raw materials,

- The "VLOG" label on the shipping documents must be checked. A complaint is to be issued to the supplier for incomplete bills of lading.
- The certification of the supplier is to be checked periodically, at least once annually.

It is recommended that non-VLOG-certified goods which meet the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) be labelled as "ingredients suitable for the production of food labelled 'Ohne Gentechnik'" on the shipping documents.

Critical raw materials include:

- Imported products with EU GMO clearance (e.g. soybeans, rapeseed/canola, and maize/corn products)
- European products permitted to be grown in the EU in GM form (e.g., maize/corn products)
- European products with neither GMO import nor cultivation clearance, but carrying a plausible risk of contamination resulting from imported products (domestic soybeans, canola, or maize/corn products)
- All raw materials of animal origin
- All products produced using microorganisms

F 3.5.1 Supplier and Producer Certificates

For every delivery, a confirmation must be obtained from the upstream supplier attesting that the currently delivered products/raw materials meet the requirements of the EGGenTDurchfG and the VLOG Standard. Based on the requirements of Chapters D 1 and F 1 the use of raw materials of animal origin is only permissible if they are certified under the VLOG Standard or a standard recognised to be equivalent.

For all raw materials of non-animal origin, this will be achieved by:

- A pertinent general confirmation concerning delivered goods that is issued by the supplier once a year
- An endorsement on the delivery slip
- A clear contractual regulation

These documents confirm that the ingredients, additives and processing aids or other substances within the meaning of Section 3 (5) EGGenTDurchfG, which are used, are not GMOs, do not consist of GMOs, and were not produced with or using GMOs. In general, adventitious or technically unavoidable traces of genetically modified material are tolerated up to a threshold of at most 0.1% per ingredient. A formally correct template may be found in Annex I.

As of 01 January 2019, only the supplier certificates referred to in Annex I will be permissible for VLOG certification.

If, in the case of aromas, enzymes, cultures of micro-organisms, additives or auxiliary substances, there are any long-term supplier certificates, the business must verify once a year in an adequate manner whether these certificates are still valid in the form issued and whether the specifications for the item in question have not been modified.

F 3.6 Segregation of Goods Flows/Exclusion of Technically Avoidable Commingling and Swapping

It must be ensured that at no time products not meeting the “Ohne Gentechnik” Standard may make their way into the flow of “Ohne Gentechnik” goods. For this purpose, the goods flow must be segregated spatially, temporally, and by means of clear and seamless labelling of all products. Where necessary, interim cleaning must be performed.

In the case of temporal segregation, it must be ensured by means of suitable process steps that any carryover of genetically modified material is reduced to a minimum. Simultaneous storage of GMO and non-GMO material is only permissible if they are spatially segregated.

During handling and storage, the labelling of raw materials/semi-finished products/finished products with regard to their suitability for “Ohne Gentechnik” production is to be correctly implemented.

These risk-targeted process steps (e.g. transport and compounding processes) must be documented in each facility with a separate proof of adequate spatial, temporal or logistical measures and their efficacy reviewed as part of the self-monitoring process. In addition, the efficacy of the measures is to be demonstrated by means of representative test results.

F 3.7 Inspection of Outgoing Goods / Declaration on Delivery Slip (KO)

GMO labelling in accordance with the VLOG Standard must be properly implemented on labels, production and goods shipping documents, specifications, etc. For advertising and marketing, only the term “Ohne Gentechnik” may be used.
It must be ensured that only such products that meet in full the statutory requirements for “Ohne Gentechnik” labelling leave the business.

In addition, VLOG certified goods must be labelled as “VLOG” goods on all shipping documents. If, for systemic reasons, no delivery slips/shipping documents are prepared (e.g. milk collection), there must be a clear contractual provision regarding delivery.

Non-VLOG-certified goods which meet the requirements of the EGGenTDurchfG must be labelled as “ingredient suitable for the production of food labelled ’Ohne Gentechnik’” on all shipping documents.

F 3.8 Traceability System (KO)

A traceability system must be installed permitting at any time to identify instantly all products in the plant/monitored site, to which “Ohne Gentechnik” labelling applies. Employees at all stages, from goods receiving through production to delivery/transport must be aware of the GMO status of the individual products and batches.

In addition, it must be possible to trace back within one working day any products that have left the business and to compile lists of quantities and evaluations which permit conclusions on the flows of goods and their plausibility. According to Regulation (EC) No. 178/2002 the following data must be collected for this purpose:

- Information on the origin, including certificates for “Ohne Gentechnik” labelling;
- Batch formation, if applicable (including re-working)

- Information regarding the raw materials, additives, and auxiliary materials used, and their origin (including rework)
- Information on delivery date and market participants supplied
- Communication information of the upstream and downstream stages

F 3.9 Handling of Non-Compliant Products (KO)

For the event of positive test results or other findings regarding a lack of compliance with “Ohne Gentechnik” requirements, a system of defect handling and labelling/blocking of non-compliant products with appropriate measures must be in place before the goods are shipped.

Handling of positive test results takes place according to Annex IV.

F 3.10 Staff Training

All staff members involved in operating procedures of relevance to “Ohne Gentechnik” labelling, including vehicle operators, must be instructed in the “Ohne Gentechnik” requirements and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity as well as on an ongoing basis, at least once a year.

The intensity of training varies depending on the staff member and must be oriented towards the responsibility of the staff member for the proper flow of the “Ohne Gentechnik” production.

These training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

F 3.11 Complaint Management and Goods Recall

Complaints concerning the requirements of the VLOG Standard by clients or other bodies (e.g. local authorities) must be documented and evaluated appropriately. For this purpose, suitable corrective action, including the determination of responsibilities, is to be initiated.

If deviations are detected in food that is still on the market, a recall system must be in place that provides for written notification of the customers.

F 3.12 Crisis Management (KO)

A crisis management system must be in place and potential dangers analysed. As part of this system, a process is to be in place that prescribes the procedure to follow in the event of a crisis. Emergency numbers/contact details of suppliers and clients must be at hand.

An internal system for blocking rejected products must be in place.

The business must inform its customers as rapidly as possible of any problems related to product specifications, in particular non-conformities relating to “Ohne Gentechnik” which have, had, or could have a defined influence on the process safety and/or legality of the relevant products. This must occur in accordance with the precautionary principle, but is not limited to it.

F 3.13 Corrective Action / Ongoing Improvement Process

In the event of complaints, the business must take corrective action in order to permanently eliminate the cause of contamination with GMO material. The measures taken are to be monitored and will be subjected to evaluation after an adequate period of time. This applies also to the corrective action from the last audit.

In particular, the handling of positive test results must be taken into consideration (see Chapter 3.9).

F 3.14 Documentation and Retention Period

All documents related to the "Ohne Gentechnik" label, e.g. delivery slips, clearance certificates, production and goods flow records (including re-working), training documents, etc. must be retained for the following period, unless statutory requirements stipulate a longer retention period: the expiration date of the batch/lot must be + 1 year and at least 2 years.

F 3.15 Protecting the Self-Monitoring System

Internal audits are to be carried out in the business annually.

F 4 Specific Requirements for Plant-Based Raw Materials

F 4.1 Sampling and Testing

Risk-targeted sampling and testing of feed for GMO within the scope of the self-monitoring system is to be undertaken according to the following description:

A food business that prepares/processes raw materials of plant origin must have a test plan based on a risk analysis and must implement it as scheduled. It must include the description of the sampling procedure. The focus is to be on the following: type of samples, sampling facilities, sampling of finished product, compiling of collective samples, naming the sampler, creation of reference samples, and sample size. The sampling plan describes the sampling frequency and the test procedure.

If a food business only prepares/processes raw materials of plant origin, and genetic modification cannot be proven by PCR testing due to technical limitations, no sampling/GMO test is necessary. In this case the test plan must provide for a risk analysis that comes to the conclusion that it is not necessary to sample/analyse any raw materials/feeds.

Frequency of Sampling and Testing

At least the following sampling frequency is to be implemented per audit interval (see Table Chapter F 4.1). The auditor is authorised to take additional samples and/or carry out additional GMO tests on a risk-targeted basis or in suspicious cases. All samples must be analysed according to Annex III. Only test results arrived at according to the requirements in Chapter I 2 and I 3 in connection with Annex III will be considered. The tests are to be carried out in laboratories recognised by VLOG as of 1/1/2019 at the latest.

Area / Risk category	Annual minimum number of samplings/tests for plant-based raw materials for "Ohne Gentechnik" labelling
0	2 x per year
1	6 x per year
2	12 x per year

The number of samples may be correspondingly reduced when the number of batches obtained in the audit period is smaller than the minimum number of samples listed in the table.

F 5 Specific Requirements for Risk-Prone Raw Materials / Ingredients

Specific requirements for risk-prone raw materials (e.g. rice) are to be determined outside the VLOG Standard in the document Risk-Prone Raw Materials/Ingredients (http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard/Version_18.01/Risikobehaftete_Rohstoffe-Zutaten_171027.pdf). The overview is to be updated regularly based on risk.

Part G: Retail Stage – Sale of Bulk Food of Animal Origin

In the following section, the requirements for the sale of bulk food of animal origin in retail is described, the certification of which is done within the scope of retail group certification. At the request of businesses or certification bodies to VLOG, the requirements for individual certification of businesses at this stage will be published.

G 1 Stage Definition and Certification Obligation

Area	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Certification according to VLOG Standard possible, despite absence of certification obligation	Requirements according to the Standard
Retail: Handling and/or processing of food products and their storage at the point of sale and delivery to the private consumer.				
Retail group organiser, hereinafter group organiser: Business in a VLOG retail group having responsibility for a self-monitoring system that includes the retail group members. In VLOG retail group certification, certification is to be issued through the retail group organiser, i.e. the group organiser receives the certification for the VLOG retail group.				
Retail group member, hereinafter group member: Branch/site contractually integrated into a VLOG group.				
	For bulk goods of animal origin at a central distribution facility and counter sales, labelled with the "Ohne Gentechnik" seal	Not relevant.	Yes	G2

G 2 Details of the Certification Process

G 2.1 Conditions and Requirements for Retail Group Certification

- Agreement between the retail group organiser and a VLOG-recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG[10]
- The VLOG group sells a very high portion of its bulk “Ohne Gentechnik” food (at least 90% of the products) to end consumers. If this is not the case, the VLOG requirements for the certification process (see Part E) and for food preparation (see Part F) must also be taken into account within the business and in the VLOG certification.
- If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with “Ohne Gentechnik” is not permitted for the entire VLOG group.
- Marketing of “Ohne Gentechnik” food may continue to be done by the retail group if individual retail group members are excluded from the group. In this case, "Ohne Gentechnik" marketing is no longer permitted only for the excluded group members.
- The retail group organiser is responsible for monitoring the implementation of corrective measures in the event of deviations by group members.

G 2.2 Process

Group certification is to be performed in accordance with the following steps.

- Application for certification in accordance with Chapter A 3.3 to a VLOG recognized certification body and submission of the group description (see Chapter G 3.1)
- Audit planning in accordance with Chapter A 3.6 with the retail group organiser (scope, date / time, duration of audit)
- Auditing of the retail group organiser and the retail group members in accordance with Chapter A 3.7 by the auditor, including evaluation of the requirements in accordance with Chapter A 3.8
- Audit evaluation / review by the certification body in accordance with Chapter A 3.8.2
    - including confirmation / correction of the audit result
    - including confirmation of the approved retail group members
- certification of the VLOG retail group in accordance with Chapters A 3.10 and G 2.2.1

G 2.2.1 Audit Intervals and Scope of the Audit

Routine audits must be conducted in the business on an annual basis. Both group organisers (Quality Management, Accounting) and the branches must be audited. If all the audit criteria, including original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.

The branches are to be audited in the form of a random audit. The number of audits is as below:

- 10% of the branches per year if “Ohne Gentechnik” food is centrally purchased

[10] Known as “certification agreement” until 20 June 2017

- 100% of the branches if the “Ohne Gentechnik” food products may be purchased decentralized by the branches.

Distribution of the Audit Report

The group organiser and/or the audited group member will receive from the certification body an audit report, including any deviations found and measures to be implemented, for each audit carried out. Depending on what was agreed upon, the group member’s audit report will either be distributed to the group members by the retail group organiser or sent to them directly.

G 2.2.2 Certificate Issuance

The certificate is to be issued to headquarters for the “bulk goods” area of application. The VLOG certificate must also indicate the category of products (e.g., poultry meat, cheese). The participating branches must be listed in an annex to the certificate.

The group organiser is to report changes to the list of members promptly to the certification body. It is the responsibility of the certification body to decide whether additional audits must be carried out.

G 2.3 KO Requirements

The following KO requirements are determined:

- Contractual Binding the Group Members (G 3.4)
- Self-Monitoring Concept/Risk Analysis (G 3.5)
- Incoming Goods Inspection (G 3.7)
- Traceability System (G 3.11)
- Crisis Management (G 3.14)

G 3 Requirements for Group Organisers and Group Members

G 3.1 Group Description

Together with the application for VLOG certification, the group organiser must submit a group description to the certification body.

The description of the VLOG retail group must contain/provide:

- An organisational chart of the business
- An overview of all sites and branches, including any outsourced warehousing or production processes
- Persons in charge of the group certification at the retail group organiser, including the persons’ contact information and provisions regarding deputies
- List of products:
  Overview or specifications for bulk “Ohne Gentechnik” goods offered by the business, including consideration of re-working

- Member list:
  A list and description of the activities of the retail group members with information about whether the purchase of “Ohne Gentechnik” food is centralised or decentralised
- A list and description of the activities of the subcontractors / contract processors/outsourced processes, which are integrated into the VLOG group, including the persons in charge and their contact information
- For further processing of bulk “Ohne Gentechnik” goods and the use of further ingredients which are not purchased from VLOG certified suppliers (e.g. marinades, mixed spices), a list of all formulations with quantity- or weight-related information on “Ohne Gentechnik” ingredients and components, including consideration of re-working
- List of all authorised suppliers of “Ohne Gentechnik” food/ingredients

If the VLOG retail group establishes a central sales concept for all branches, which is implemented in an identical manner by all the branches, it is sufficient if a single description of the group is prepared, regularly updated and available at the respective group member. Deviating characteristics of individual branches are to be documented correspondingly in the group description.

The retail group description must be kept up to date by the group organiser, and changes relevant to certification must be promptly reported to the certification body. The current retail group description must be available at the retail group organiser and the retail group members.

For the audit, the updated group description, annexes, and documents listed therein must be submitted to the auditor for review. Information provided in electronic form will be accepted. At the request of the business, all documentation other than the product and member list may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. The current product and member list must be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

At the request of VLOG, the group organiser must promptly send the current list of members to VLOG.

G 3.2 Commissioning Multiple Certification Bodies

If the group organiser commissions more than one certification body to audit the group members:

- The group organiser is to describe the areas of responsibility of the different certification bodies (e.g. which certification body will audit which group member/member groups).
- The groups must be organised so that each certification body independently deals with a respective group or its area of responsibility.
- The certification body must also audit compliance with the group organiser’s requirements in the determined area of responsibility. Depending on the area of responsibility, the audits may be conducted at the headquarters or at the retail group member.
- The certification body is to issue a certificate (e.g. for the group dealt with) depending on the area of responsibility.
- The group organiser is responsible for making sure that all activities subject to certification are audited.

G 3.3 Assignment of Responsibilities / Organisational Chart

The current business structure and an organisational chart must be available in written form on the premises and must contain details of responsibilities and a deputy plan to cover for absences for the

operating procedure relevant to “Ohne Gentechnik”. The designation of responsibilities within the branches may be linked to functions/job descriptions.

G 3.4 Contractual Commitments of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract/participation statement stipulating compliance with the VLOG Standard and with the requirements and obligations of the individual group’s self-monitoring system.

G 3.5 Self-Monitoring Concept / Risk Analysis (KO)

A self-monitoring concept including a risk analysis for bulk “Ohne Gentechnik” goods must be in place that takes into account the necessary segregation of bulk “Ohne Gentechnik” goods from bulk goods that are not suitable for “Ohne Gentechnik” production (see Chapter G 3.8), at a minimum the following points:

- Goods procurement and goods receiving
- Storage
- Processing
- Cleaning and disinfection
- Sales/Declaration

The self-monitoring concept of the food business must take account of the required segregated handling.

Based on the HACCP concept, if necessary, preventative, monitoring and controlling measures must be implemented concerning the correctness of the “Ohne Gentechnik” labelling.

If further ingredients (e.g. marinades) not procured from VLOG-certified suppliers or suppliers certified in accordance with another equivalent standard are added to the bulk “Ohne Gentechnik” goods in the branch, the risk analysis must be expanded to assess the possibility of the use of flavourings, enzymes, microorganisms, additives, auxiliary substances, and other food ingredients, based on certificates provided by the suppliers. A template of a correct certificate confirming the GMO-free status of a product is included in the VLOG Standard, see Annex I. The use of raw materials of animal origin is only permissible if they are certified under the VLOG Standard or a standard recognised to be equivalent.

G 3.6 Procurement (Suppliers and Producer Certification)

A system must be in place for approval of suppliers and articles. In the purchasing department, the ordering of bulk “Ohne Gentechnik” goods must be traceable; this applies also for “Ohne Gentechnik” ingredients. For bulk “Ohne Gentechnik” goods, the following documents are to be available:

- List of suppliers
- List of articles
- Specifications

G 3.7 Incoming Goods Inspection (KO)

At goods receiving, a documented inspection is to be performed

- of the “Ohne Gentechnik” labels on the packaging and delivery documents and/or invoice; and
- of the VLOG certificate and/or approval of the supplier.

G 3.8 Segregation of Goods Flows / Exclusion of Commingling and Swapping

It must be ensured in a retraceable manner that at no time products not meeting the “Ohne Gentechnik” standard make their way into the flow of bulk “Ohne Gentechnik” goods. To this end, the goods must be segregated spatially (e.g. using shelves, crates, or trays) during storage, handling, and presentation / sale, as well as through clear and seamless labelling of the “Ohne Gentechnik” raw materials / semi-finished products/finished products.

Joint storage of bulk “Ohne Gentechnik” goods with bulk goods not suitable for “Ohne Gentechnik” labelling is not permitted. Clear segregation, e.g. using different containers, is mandatory.

All reusable devices and containers used for the processing, presentation and storage of “Ohne Gentechnik” products must be prepared prior to being used for “Ohne Gentechnik” products such that the possibility of commingling is excluded.

Segregation measures, interim cleaning stages and production sequences are to be defined and implemented in a risk-oriented manner in the self-monitoring system.

G 3.9 Processing

Defined, binding formulations stating quantities and weights are to be available for all self-processed “Ohne Gentechnik” products.

The formulations may only contain ingredients that meet the requirements for the production of “Ohne Gentechnik” products in accordance with the VLOG Standard.

G 3.10 Labelling

Price tags and/or product labels must bear the mention “Ohne Gentechnik”.

G 3.11 Traceability System (KO)

A traceability system must be installed permitting at any time to identify instantly all products in the plant / monitored site to which “Ohne Gentechnik” labelling applies.

Employees at all levels, from goods receiving through processing to sale, must be familiar with the “Ohne Gentechnik” status of the individual products and batches, as appropriate for their duties.

In addition, it must be possible to trace back within one working day any sold products and to compile lists of quantities and evaluations which permit conclusions on the flows of goods and their plausibility. According to Regulation (EC) No. 178/2002 the following data must be collected for this purpose:

- Information on the origin/supplier, including certificates for “Ohne Gentechnik” labelling;

- Batch formation, if applicable (including re-working)
- Information regarding the raw materials, additives, and auxiliary materials used, and their origin (including rework)
- Communication data from the upstream stages

The sale, refinement, write-offs, and inventory adjustments of bulk “Ohne Gentechnik” goods must be documented in the business item by item and with traceable and verifiable quantity information. The labelling system must be defined and clearly recognisable.

G 3.12 Staff Training

All staff involved in the “Ohne Gentechnik” sector (including internal auditors) must be demonstrably trained concerning the “Ohne Gentechnik” requirements and the operating procedures laid down therein that are related to their tasks. Training must take place before they take up their activity as well as on an ongoing basis at least once a year.

The content of the training varies depending on the role of the staff member and must be geared towards the responsibility of the staff member for the proper flow of the “Ohne Gentechnik” production.

These training sessions must be documented regarding their content, their participants, as well as the training date and the authors/instructors.

G 3.13 Corrective Action/Ongoing Improvement Process

A defined process for dealing with non-conforming products must be established in the business. It must be ensured that only products meeting in full the statutory requirements and the requirements of the BLOG Standard for “Ohne Gentechnik” labelling are marketed as such.

Complaints regarding the “Ohne Gentechnik” quality by clients and other entities (e.g. authorities) are documented and evaluated in an adequate manner. In the event of anomalies and complaints, the business/facility must perform a root cause analysis and take corrective measures as needed in order to prevent a recurrence of the anomaly/cause for complaint. The measures taken are monitored and will be subjected to evaluation of their effectiveness after an adequate period of time. This applies also to the corrective action from the last audit.

G 3.14 Crisis Management (KO)

A crisis management system must be in place and potential dangers analysed. The crisis management process is to be described, also taking into account the branches. All relevant contact information is to be available. This includes information of, e.g., the suppliers and the VLOG office.

An internal system for blocking non-compliant products must be in place.

G 3.15 Documentation and Retention Periods

The records must be easily legible and authentic. All documents related to the “Ohne Gentechnik” label, e.g. delivery slips, suppliers’ declarations, production and goods flow records (including re-working), training documents, etc. must be retained for at least 2 years, unless statutory requirements stipulate a longer retention period.

The abrogation of documentation and retention periods for formulations / formulation changes must be approved by a manager at the facility.

G 3.16 Protecting the Self-Monitoring System

An annual process review is performed and documented across the entire VLOG group, e.g. as part of an internal audit. Anomalies are to be remedied in accordance with Chapter G 3.14.

During the process review, at least two risk-oriented random spot checks on product traceability are performed each year, including a comparison of quantities. Compound food products are also taken into account, if produced by the business or at its branches. These spot checks and results must be traceably documented.

The following additional checklist points must be addressed during the self-monitoring review: “Ohne Gentechnik” labelling in the business, update status and implementation of the facility descriptions, and process and work instructions.

Part H: Requirements for Certification Bodies and Auditors

In the following part, the specific rules and requirements for certification bodies and auditors are described.

H 1 Requirements for Certification Bodies

The certification body must prove that it is validly accredited according to ISO/IEC 17065 for at least one standard each of the food and feed industry to ensure the processes in the certification body. The certification body must review and confirm the professional qualification and competence of the auditors and evaluators/certifiers, and must use qualified and trained auditors and evaluators/certifiers only. The certification body must describe the qualification requirements in its quality management manual as well as in the respective education and training documents for the auditors.

All documents, including training materials, which prove the qualifications of the certification body's personnel and the auditors must be available at the certification body and provided to VLOG if requested.

The certification body must have at least two auditors under contract who have the qualifications described in Chapter H 2.

The "four-eyes" principle must be used for audits and certification according to the VLOG Standard. The auditor is not permitted to make final decisions on certification for audits he himself performed.

The certification body must maintain sufficient personnel for evaluating and certifying VLOG audits. Evaluation and certification may be performed by the same person. The following qualifications must be required of personnel performing the evaluation and/or making the certification decisions:

- The evaluator/certifier must have participated in a VLOG-approved training program for the VLOG "Ohne Gentechnik" Standard. After expiry of the training certificate, no further "Ohne Gentechnik" audits may be performed unless the evaluator/certifier has completed a further training session.

The certification body performs audits and certifications in accordance with the procedures described in Chapter A 3. In the event that a VLOG-certified business is suspected to be at fault, the certification body will perform additional unannounced audits addressing the suspected problem.

No later than eight weeks after the VLOG "Ohne Gentechnik" audit, the certification body must release to VLOG the audit results:

- For initial or routine audits:
  - Current facility description including a list of "Ohne Gentechnik" or "VLOG geprüft" products,
  - VLOG checklist(s),
  - VLOG certificate,
  - Additional certification-relevant annexes, if needed
- Follow-up audit/sample audit/audits in suspicious cases:
  - VLOG checklist including annexes of relevance to certification
  - VLOG certificate, if applicable.
- In the case of group certification, transmission of the certification documents of the group organiser is sufficient, including the current list of members, if this is not clear from the certification documents.

Upon request by VLOG, the certification body must promptly make available to VLOG the following documents:

- Audit results of the group members
- Current list of members

If the information regarding the certification decision or the participating auditing and certification personnel is not clear from the audit results provided, these must be reported to VLOG separately.

In the event of violations of these requirements, the sanctions specified in the contract between the certification body and VLOG apply.

H 2 Requirements for Auditors and Their Qualifications

- Evidence of competence must be furnished by an appropriate number of annual audits in the respective sector (agriculture, feed industry or preparation/manufacture of food products; at least 10 full audits of different businesses per sector in the preceding two years), appropriate training and qualification for at least one recognised quality assurance standard such as QS, GLOBAL G.A.P., IFS, GMP+.
- The evaluator / certifier must have participated in a VLOG-approved training program for the VLOG “Ohne Gentechnik” Standard. After expiry of the training certificate, no further “Ohne Gentechnik” audits may be performed unless the auditor has completed a further training session
- An auditor may only perform a standard audit of the same business three consecutive times.
- An auditor may not perform audits of businesses, producers, or producer groups for which he provided consulting in the previous two years.
- The auditor is to complies strictly with the business’s and the certification body’s procedures for the confidential treatment of information and records.

Justified deviations from the qualification requirements must be approved in writing by the VLOG office.

Part I: Requirements for Laboratories and Tests

I 1 Requirements for Commissioning a Test

The client commissioning the GMO test undertakes:

- To regularly examine the accreditation of the commissioned laboratory pursuant to DIN EN ISO/IEC 17025 (see I 2.1) at least once a year until 31 December 2018.
- To check the VLOG recognition of the commissioned laboratory (see I 2.1) on 1 January 2019 and regularly thereafter, at least once per year.

When commissioning a laboratory, the following information must be indicated in the order or other documents having similar effect, and submitted to the laboratory:

- Order of GMO tests according to this catalogue of requirements
- Composition of the sample:

  If containing soy, maize/corn, rapeseed/canola and/or rice single-component feed or ingredients, it must be indicated in what form these are contained (e.g. maize/corn as maize/corn mash, soy as soy extraction meal). Copies of the feed delivery slips/shipping documents/declarations are to be sent to the laboratory along with the samples.

Upon receipt of the test results, the client must verify whether the laboratory confirms it will comply with the requirements mentioned in Chapter I 2 and I 3. This may be done for every test result in the audit report or in a separate confirmation that is issued by the laboratory once a year.

I 2 Requirements for Laboratories

For certification according to the VLOG Standard, only test results obtained according to the following requirements will be recognised.

I 2.1 General Requirements and Recognition by VLOG

- The laboratories must be accredited according to DIN EN ISO/IEC 17025 (in its most recent version) for all qualitative and quantitative GMO test parameters. This may be in the form of a flexible accreditation for the entire field or separately for all procedures to be carried out.
- Subcontracting of (partial) tests is permitted under the following conditions:
  - All laboratories involved in GMO testing must be recognised by VLOG by 1 January 2019 at the latest, and comply with the method specifications of the VLOG Standard applicable to their scope of operation (see Chapter I 2.2).
  - Compliance with the VLOG Standard is to be agreed between the participating laboratories in writing.
  - VLOG-recognised laboratories must maintain up-to-date documentation of which laboratories they subcontract (partial) testing to, and for which laboratories they perform GMO tests in accordance with the VLOG standard.
  - Samples are to be milled entirely by a single laboratory, which then sends portions of the milled sample to the participating laboratories.

- The VLOG recognised laboratory must send a test report to the principal for analysis, even if multiple laboratories have participated in the testing.

Laboratories must be recognised by VLOG as of 1 January 2019 at the latest. Laboratories may apply for VLOG recognition as of 1 April 2018. Compliance with the requirements specified in I 2.1 and I 2.2 and the capability of fulfilling the scope of test required by Annex III must be demonstrated to VLOG in writing when the application is filed [11].

After being recognised, the laboratory must prove to VLOG that it regularly and successfully participates in comparative laboratory audits, with reliable results for GMO testing. During the first quarter, the laboratory must submit to VLOG proof of its participation, without being so requested, in at least

- One laboratory comparison regarding GMOs for quantitative results with a good z-score (+/-2); and
- One laboratory comparison regarding GMOs for qualitative results (100% correct positive or negative results) for the matrix for feed or plant-based raw materials/plant-based processed products, stating the z-score.

Furthermore, in the event of re-accreditation or a change to the scope of the accreditation, the laboratory must submit to VLOG the updated accreditation certificate according to DIN EN ISO/IEC 17025 within 4 weeks.

VLOG reserves the right to check compliance of requirements through an audit of the laboratory.

I 2.2 Methodological Requirements

DIN standards and protocols of the Joint Research Centre (JRC; http://gmocrl.jrc.ec.europa.eu/StatusOfDossiers.aspx) are to be used (if available/present). For methods from other sources, the laboratory must verify that similar minimum requirements are fulfilled.

I 2.2.1 Testing Process

Milling:

Depending on the sample matrix, the following minimum amounts of sample material are to be completely milled in each case:

- Feed: min. 400 g, max. 1 kg, entirely milled
- Raw materials (whole maize/corn kernels, soy beans or rapeseed/canola grains, among other): at least 3000 grains or approx. the respectively corresponding sample amount (maize/corn at least 1000 g; soy at least 700 g, rapeseed/canola at least 60 g), entirely milled

DNA extraction:

At least two DNA extractions from each sample will be carried out after every milling/homogenisation. The required weight is at least 2000 mg for feed, seeds and materials that are suspected of being not being homogenously distributed. In exceptional cases (for otherwise non-extractable material), the weight may be only 500 mg.

[11] Deviations from the qualifications must be justified in detail in the application and require written consent by the VLOG office.

PCR test:

Real-time PCR methods with probe technology (45 cycles) are recommended. When using conventional endpoint PCR methods, an additional confirmation reaction is carried out (e.g. real-time PCR with probe technology, restriction test or sequencing).

I 2.2.2 Protecting the Analytical Procedure

All quality checks according to the relevant ISO and DIN standards must yield the results required by these standards. The laboratory ensures that the measurement results are not affected by any inhibitory effects. If the measurements are so different from the control values that the tolerance limits set by the laboratory for deviations or quality specifications are exceeded, the PCR process must be repeated.

To prevent repeat errors, instability of reagents etc., methods for regularly carrying out and documenting QC measures must be established and implemented (e.g. control charts).

I 2.2.3 Approval of Test Results

The results are to be approved according to the four-eye principle by an authorised person.

I 2.2.4 Requirements for Test Reports

Aside from the information required by DIN EN ISO 24276, DIN EN ISO 21569 and DIN EN ISO 21570, test reports must contain at least the following information:

- Quantity of sample milled and sent
- Quantity of sample used in the DNA extraction
- Exact description of the sample
- Detection limits (LOD in % or as copy number of target)
- Method applied
- Test result
- Error margin of the procedure
- Confirmation that the result was determined according to the requirements of the VLOG Standard. In the alternative, this confirmation may take place in a separate letter to be submitted to the certification body once a year.
- Additionally, for identification/quantification:
  - Warning if the amount of species-specific DNA is not sufficient for quantitative statements regarding the relevant threshold value (0.1% or 0.9% GMO DNA).
  - When quantifying, to indicate the average deviation of the sub-samples (at least double preparation); indicating the pLOQ is recommended.

I 2.2.5 Interpretation of the Test Results – Test and Evaluation Criteria

The test report must contain a conclusive evaluation for each sample regardless of whether or not the sample complies with the requirements of the VLOG Standard for the parameter analysed. The standard deviation must be taken into consideration for each evaluation in order to take into account the inhomogeneous distribution of GMOs in feed or food: In keeping with Regulation (EC) No. 691/2013, the analysed GMO content, after deduction of the expanded error margin, is to be used for evaluation.

Chapter 5 and Annexes 1 and 2 of the “Guideline for Testing for GMOs in Feeds” must be respected for the evaluation of feed.

If a conclusive evaluation of the test results is not possible, this must be appropriately shown in the test report (note in the event of limited analysability of the sample, indication of the practical LOD, missing information for single-component feeds).

I 3 Requirements for the Test Scope

The requirements for the test scope in accordance with Annex III must be complied with by the laboratory.

Annexes

Part 1 Suppliers' Declarations

I. GMO-Free Certificate According to the VLOG "Ohne Gentechnik" Production and Certification Standard

Part 2 Analytics

II. Sampling Log
III. Requirements for the Scope of Test
IV. Dealing with positive test results

Part 3 Certification

V. VLOG Group Certification Process at the Agriculture Stage
VI. Sanctions Catalogue
VII. VLOG Certificate Template
VIII. Areas of Application of VLOG Certification

Part 4 Audit Documents

IX. Facility Description Logistics
X. Checklist Logistics
XI. Facility Description Feed
XII. Checklist Feed
XIII. Facility Description Agriculture
XIV. Facility Description Animal Transportation/Animal Trade
XV. Checklist Agriculture
XVI. Checklist Group Organisation
XVII. Facility Description Food
XVIII. Checklist Food
XIX. Checklist Retail – Bulk Goods

Glossary – Definition of Terms

For the sake of simplification, the following definitions and abbreviations are provided:

Animal category: Animals which fundamentally differ in their husbandry conditions are regarded as different animal categories (e.g. breeding pigs/fattening pigs, laying hens/chickens for fattening, heavy livestock/dairy cattle) (Swiss Confederation: Instructions and Explanations 2012, February 2012).

Auditor: Personnel to be made available by the certification body for the auditing of businesses. The auditor's responsibilities are described in ISO/IEC 17065.

Batch: An identifiable quantity of feed verifiably having common properties, such as origin, type, type of packaging, packer, shipper, or labelling.

Business: The administrative seat of a member operation. A general organisation which may consist of multiple facilities.

Certifier: Personnel to be made available by the certification body for certifying businesses. The certifier's responsibilities are described in ISO/IEC 17065

Component: All ingredients, additives, auxiliary processing substances, or other substances within the meaning of Sec. 3 (5) of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) used in the production of feed or food products.

Compound feed: Compound feeds are mixtures of single-component feeds (input products for feed), with or without additives, which are intended as complete or supplementary feeds for animal nutrition.

Conversion of single-component feeds to "VLOG geprüft" quality: Through incorporation into

- the VLOG certification system
- a business' internal self-monitoring system and
- in particular, a GMO monitoring system in accordance with Chapter C 3.3,

purchased single-component feeds can attain "VLOG geprüft" quality at a feed dealer's. Single-component feeds can also be processed (e.g. shredded, milled, pelleted).

Correction: A correction is a measure to eliminate a known fault.

Corrective action: Action/actions, leading to the elimination of the causes of a fault, a shortcoming or any other undesired situation in order to avoid their reoccurrence or to reduce the frequency of reoccurrence.

Defective Product: Food or feed that does not comply with "Ohne Gentechnik" or "VLOG geprüft" requirements.

Dual Production: Shared use of facilities and/or transportation means for the production, processing, transport, storage, handling and/or trade of "Ohne Gentechnik" food or "VLOG geprüft" feed and food that does not comply with "Ohne Gentechnik" or "VLOG geprüft" requirements.

EGGenTDurchfG: German act on the implementation of European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes (German EC Genetic Engineering Implementation Act).

Evaluator: Personnel to be made available by the certification body for the auditing of businesses. All information and results related to the on-site audit (evaluation) is to be evaluated. The evaluator may not be involved in the on-site audit. The evaluator issues the certifier a recommendation regarding whether certification should be granted. If the evaluator and certifier are different people, the result of the evaluator must be documented separately.

Feed: Substances or products, including additives, be it in processed, partially processed or unprocessed form, which are intended for oral feeding of animals.

Feed business: All businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in the production, manufacturing, processing, storage, transportation or distribution of feed, including producers who produce, process or store feed to be fed to animals in their own business (Regulation (EC) No. 178/2002).

Feed not subject to compulsory labelling: Feed which, according to Regulations (EC) No. 1829/2003 or No. 1830/2003, is not subject to compulsory labelling as "genetically modified".

Feed subject to compulsory labelling: Feed which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, has to be labelled as "genetically modified".

Food: Any and all substances or products that are intended for, or which can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

Food business: Any and all businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in an activity connected to the production, processing, and distribution of food.

GMOs: Genetically modified organisms; according to Regulation (EC) No. 2001/18 these are organisms in which the genetic material has been modified by means of molecular biological methods in a way that naturally is not possible by interbreeding and/or recombination.

Group member: (Agricultural) business or branch/facility integrated into a VLOG group.

Group organiser: Business of a VLOG group with responsibility for a self-monitoring system covering the group members and, for the production of food products of animal origin, also PCR analyses of the feed employed. VLOG certification of the VLOG group is carried out for and/or about the group organiser.

Internal audit: General audit process for all of the business's own activities. Carried out by or on behalf of the business for internal purposes. Internal auditing is an independent, objective monitoring and consulting activity that is intended to provide added value and improve the operations of a business.

KO criterion: A requirement the non-compliance of which has a critical effect on "Ohne Gentechnik"/ "VLOG geprüft" labelling.

Logistics business: Any and all businesses which carry out logistical activities with food and feed, e.g., transport, storage, distribution, loading and unloading (IFS Logistics, Version 2). Mobile grinding and mixing devices come under the category of logistics businesses as well.

Mineral feed: Supplementary feed containing at least 40% crude ash

Operating unit: Parts of a business which are completely separate from each other, except for their organisation. This may apply for, e.g., different stables or storage sites for feed. For agricultural operations in Germany, parts of such a business that are assigned a VVVO number are defined as an operating unit.

Processed product: Food which has been produced from unprocessed products; these products may contain ingredients that are necessary for their production or for imparting special qualities. "Processing" (Regulation (EC) No. 852/2004).

Processing: A substantial modification of the initial product, e.g., through heating, smoking, curing, ripening, desiccating, marinating, extracting, extruding, or through a combination of these different procedures (Regulation (EC) No. 852/2004).

Raw materials: Any and all materials used to produce a food product.

Retail: Handling and/or processing of food and its storage at the point of sale or delivery to the final consumer, including shops, supermarket distribution centres and wholesale outlets.

Risk (within the meaning of the Standard): The probability of the occurrence of damage or non-conformity (legal or with regards to the standard) to "Ohne Gentechnik" food or "VLOG geprüft" feed due to danger.

Risk-prone feed:

Feed that has a higher risk of GMO carryover due to the cultivation situation of the plant species, origin processing and/or supply chain. In accordance with the VLOG Standard, their compliance must be ensured by monitoring through GMO testing or a VLOG certificate.

- In the Feed Stage, feed is graded into risk-prone feed on the basis of a risk assessment of the feed business (cf. Chapter C 3.3).
- For the Agricultural Stage, Chapter D 4.3.1 defines risk-prone feed.

Single-component feed: Single-component feeds are feeds intended, as such or in processed form, to be fed to animals or used in the production of compound feed. Single-component feeds are of plant, animal, or aquatic origin, or composed of other organic or inorganic matter.

Site/facility: Each unit of a food-producing business. A facility is a site of a business with all areas and buildings in which the complete production process for a single product is carried out.

Small agricultural operation:

- The main production focus is on milk, with a dairy herd of less than 40 lactating animals.
- The main production focus is on eggs, with less than 10,000 animals.
- The main production focus is on broiler chicken, with less than 16,000 fattening places.
- The main product ion focus is on fattening pigs, with space for less than 600 animals.
- Or a facility, independent of the main product and number of animals, with not more than 1 full-time employee (at least 38 hrs/week) other than the facility manager and any members of the manager's family.
- Upon request, the VLOG will provide a definition of the main production focus of small agricultural operations that are not mentioned here.

Supplementary feed: Compound feed having a high content of certain substances, but the composition of which makes it suitable for the daily ration only in combination with other feeds.

Swappable or non-swappable GM feed/raw materials: GM feeds are swappable if their use, by their nature, would also be possible in "Ohne Gentechnik" production; e.g. GM soy meal in pig fattening and "Ohne Gentechnik" milk production. Feed is non-swappable if clearly assigned to a production line and their use in "Ohne Gentechnik" production is highly unlikely; e.g. GM milk replacers for calf rearing and an "Ohne Gentechnik" milk production

VLOG animals/VLOG animal categories: Animals or animal groups suitable for "Ohne Gentechnik" labelling of the food produced from them, and which are from agricultural operations which

- Are either themselves certified according to the VLOG Standard for animals or meat, or
- Are covered by a group certification according to the VLOG Standard for animals or meat.

VLOG certificate: Confirmation of successful compliance with the VLOG "Ohne Gentechnik" Standard issued by a certification body recognised by VLOG.

VLOG group: A VLOG group is an association of businesses or sites/branches (the group members) for the purpose of VLOG group certification.

Literature

- Guideline for the Control of GMOs in feed (German: Leitfaden zur Kontrolle von GVO in Tierfutter – version of November 2011). Monitoring of the production, of handling, of use and of bringing to market of feed in connection with genetically modified organisms (GMOs). Policy guidelines for the implementation of legal regulations. Compiled by the 'GMOs in Feed' project group of the Feed Working Group within the Working Group for Consumer Protection of the German Länder (German: LAV – Länderarbeitsgemeinschaft Verbraucherschutz) with the participation of the Federal Government and the Association of German Agricultural Analytic and Research Institutes (VDLUFA) - available in German only.
- Sampling of feed for the test of GMO components authorised in the EU within the framework of an examination of compulsory labelling; compiled by the Working Group PCR Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes (VDLUFA), dated July 2010
- Concept of test of genetically modified feed. Working paper of the Working Group PCR Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes (VDLUFA), dated February 2011
- Praxishandbuch "Bio-Produkte ohne Gentechnik" (Practical Handbook "Organic Products without Genetic Engineering" – in German – from the German Association of Organic Farmers, Food Processors and Traders (Bund Ökologische Lebensmittelwirtschaft – BÖLW), Ökoinstitut and the Research Institute for Biological Agriculture (Forschungsinstitut für biologischen Landbau – FiBL. http://boelw.de/themen/gentechnik/bioxgen/
- Legal opinion (17 pages, in German) by [GGSC], a Berlin law firm commissioned by VLOG, dated 23 November 2015 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/