

VLOG Version 19.01	Dealing of Positive GMO Test Results (Feed)	Annex V 18.12.18
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Evaluation of test results and measures to be taken

For the security of the “Ohne Gentechnik” production it is important that samples collected not only be analysed quickly but that the test results be clearly evaluated and any (immediate and corrective) measures required be derived and implemented. Positive GMO test results for feed are handled under the VLOG Standard in accordance with the following flow chart.

Second or third analyses of the sampled batch are permitted, but must be performed immediately (express analysis). If two test results with different conclusions are obtained for a single sample, the following procedure is to be undertaken, resulting in a final finding:

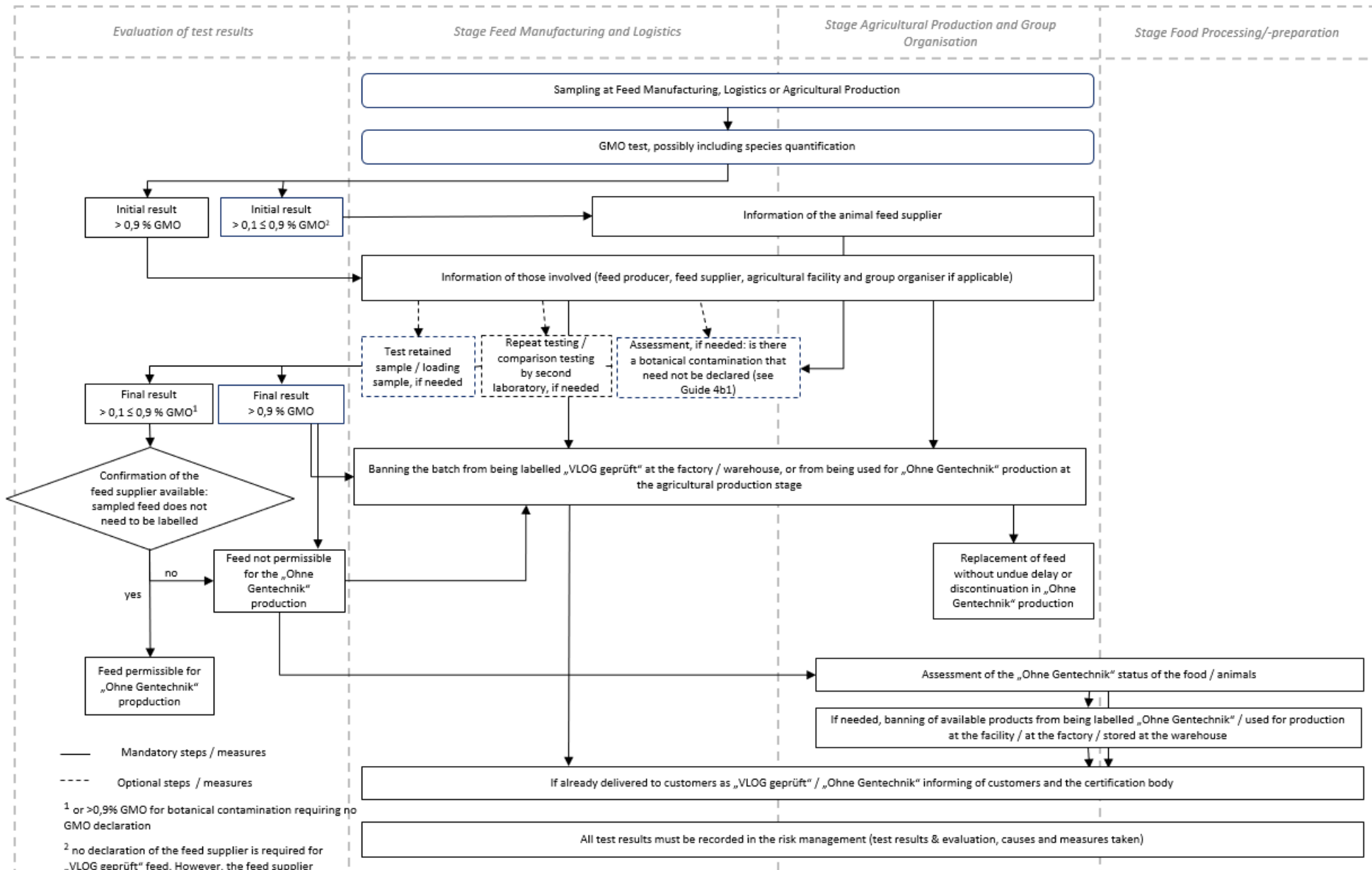
- If the results overlap, taking into account the expanded measurement uncertainty, the average value of the two test results is used.
- If the results do not overlap, taking into account the expanded measurement uncertainty, a third test of the batch is ordered.

The results of the test for GMO carryover in feed are shared with the relevant system partner for the given situation. Both the feed supplier and the affected agricultural operation must comment on the matter using appended declarations¹. The feed supplier must determine whether other feed customers are affected by the case, and inform them if this is the case.

In the event of an inaccurately labelled delivered feed or food product, the producer’s customers and certification body must be notified.

The internal audit and VLOG audit of the neutral certification body examine whether the analytical test results were evaluated correctly, and any necessary (corrective) measures properly implemented.

¹ In the case of analysis results of “VLOG geprüft” feed between 0.1 and 0.9 % GMO, no statement by the feed supplier is required. However, the company informs the feed supplier of the positive analysis result.



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Standardised forwarding and requesting of information in the event of positive feed GMO test results

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1 >0.9% GMO

1a. >0.9% GMO information to feed supplier

Positive feed GMO test result Notice to feed supplier

To whom it may concern,

In the course of routine "Ohne Gentechnik" testing, the following feed was tested for GMO material:

Feed (exact name)	<input type="checkbox"/> Compound feed <input type="checkbox"/> Single-component feed
Delivery date	
Batch identification number	
Number of delivery slip, if applicable	
Date of delivery slip, if applicable	
Date sample taken	
Place sample taken	
Unique sample identification (e.g. Sample ID)	
Date of test report	
Species with finding of GMO content (e.g. soy, maize/corn, ...)	
Test result (PCR)*	Species: GMO positive, >0.9%; exact value: %, of which Event 1 %, Event 2 %, Species: GMO positive, >0.9%; exact value: %, of which Event 1 %, Event 2 %
In the case of compound feed: Species with finding of GMO content declared as compound feed component?	<input type="checkbox"/> Yes: If declared: Quantity of species: % <input type="checkbox"/> No: quantified amount of species: %
Agricultural operation affected, if applicable	

* % GMO DNA as a percentage of total DNA of the relevant species

A "GMO-positive" test result was obtained. This result is greater than 0.9 % GMO content and is not acceptable for the production of "Ohne Gentechnik" food products of animal origin or "VLOG geprüft" feed. The feed shipment is rejected.

Please provide a prompt response to this test result using the enclosed form, at the latest within 5 business days, and inform us of the measures taken by your business to restore the conformity of the feed supplied by your firm.

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If shipped by group organiser, please also include the following:

We have notified the affected farmer of the result. Please contact without undue delay² the agricultural operation immediately and ensure that the affected feed be not used in “Ohne Gentechnik” production of foods.

If shipped by the agricultural operation, please include the following:

Remaining portions of the batch have been blocked by my agricultural operation. Please see to it that the feed be promptly replaced with feed not subject to labelling requirements.

With best regards

² see section § 121 (1) sentence 1 BGB „without culpable delay”, Therefore if an immediate stop of feeding is not justifiable because of reasons of animalhealth, the feeding can – in agreement with the certification body – be continued in the needed amount until new feed is available.

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1b. >0.9% GMO; In the case of rejection: Notice and form letter to producer

Positive feed GMO test result

Notice to producers of "Ohne Gentechnik" food products of animal origin

To whom it may concern,

In the course of routine "Ohne Gentechnik" testing, feed supplied to your business was tested for GMO material. The results of these tests revealed that the batch delivered to you should have been subject to labelling as containing GMOs, and was not permissible for use in the production of "Ohne Gentechnik" food products (see below).

You have undertaken to use only feed not subject to a labelling obligation in your "Ohne Gentechnik" production. Any remaining stocks of the delivered batch may not be used in "Ohne Gentechnik" production. Please immediately undertake and document measures to ensure this is done.

If you need feed, please immediately contact your feed supplier to ensure that you receive a supply of feed not subject to the GMO labelling obligation.

Please complete, sign, and send us the enclosed declaration within 5 business days.

Feed (exact name)	<input type="checkbox"/> Compound feed <input type="checkbox"/> Single-component feed
Delivery date	
Batch identification number	
Number of delivery slip., if applicable	
Date of delivery slip, if applicable	
Date sample taken	
Place sample taken	
Unique sample identification (e.g. Sample ID)	
Date of analytical test report	
Species with finding of GMO content (e.g. soy, maize/corn, ...)	
Test result (PCR)*	Species: GMO positive, >0.9%; exact value: %, of which Event 1 % Event 2 % Species: GMO positive, >0.9%; exact value: %, of which Event 1 % Event 2 %
In the case of compound feed: Species with finding of GMO content declared as compound feed component?	<input type="checkbox"/> Yes: If declared: Quantity of species: % <input type="checkbox"/> No: quantified amount of species: %
Agricultural operation affected, if applicable	

* % GMO DNA as a percentage of total DNA of the relevant species

With best regards

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Positive feed GMO test result

Form letter to producers of "Ohne Gentechnik" food products of animal origin

Please send back by email or fax (XXXX)

We hereby confirm

that we have been informed on _____._____._____ about the positive GMO test result of the following delivered feed:

Impacted Feed (exact name)	<input type="checkbox"/> Compound feed <input type="checkbox"/> Single-component feed
Delivery date	
Batch identification number	
Number of delivery slip, if applicable	
Date of delivery slip, if applicable	
Amount of delivered feed	kg

- At the time of the information, the feed had already been completely used up.
- At the time of the information, the following remaining quantities of the feed were still on hand:

_____ kg

When the positive GMO test result became known,

- The using of this feed has immediately been stopped.
- The feed had not yet been used in the VLOG production and therefore was blocked for the VLOG production immediately.
- The feed was substituted without undue delay³ but still in use until _____._____._____ because of the following reason/s:

- The remaining quantities were/will be taken back by the supplier on: _____._____._____
- The remaining quantities were/will be used for the following purpose:

- Our VLOG-certification body and if applicable group organiser have been informed about the instance on _____._____._____ and the procedure was coordinated with it/them.

Date

Signature and seal of agricultural operation

³ see section § 121 (1) sentence 1 BGBB „without culpable delay”, Therefore if an immediate stop of feeding is not justifiable because of reasons of animalhealth, the feeding can – in agreement with the certification body – be continued in the needed amount until new feed is available.

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2. $>0.1 \leq 0.9\%$ GMO

2a. $>0.1 \leq 0.9\%$ GMO: Letter to feed supplier

Positive feed GMO test result Notice to feed supplier

To whom it may concern,

In the course of routine "Ohne Gentechnik" testing, the following feed was tested for GMO material:

Feed (exact name)	<input type="checkbox"/> Compound feed <input type="checkbox"/> Single-component feed
Delivery date	
Batch identification number	
Number of delivery slip, if applicable	
Date of delivery slip, if applicable	
Date sample taken	
Place sample taken	
Unique sample identification (e.g. Sample ID)	
Date of test report	
Species with finding of GMO content (e.g. soy, maize/corn, ...)	
Test result (PCR)*	Species: GMO positive, $>0,1 \leq 0.9\%$; exact value: %, of which Event 1 %, Event 2 %, Species: GMO positive, $>0,1 \leq 0.9\%$; exact value: %, of which Event 1 %, Event 2 %
In the case of compound feed: Species with finding of GMO content declared as compound feed component?	<input type="checkbox"/> Yes: If declared: Quantity of species: % <input type="checkbox"/> No: Quantified amount of species: %
Agricultural operation affected, if applicable	

* % GMO DNA as a percentage of total DNA of the relevant species

A "GMO positive" test result of between $> 0.1 \leq 0.9\%$ GMO was obtained for the abovementioned feed. This feed is only permissible for use in "Ohne Gentechnik" or "VLOG geprüft" production if the GMO carryover was accidental or technically unavoidable.

Please provide a prompt response to this test result using the enclosed form, at the latest within 7 business days, and inform us of the measures taken by your business to restore the conformity of the feed supplied by your firm.

With best regards

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2b. >0.9 % / ≤ 0.9% GMO: Form letter to feed supplier

Positive feed GMO test result of XXX / Sample XXX:

Confirmation form for feed supplier

Please send back by email or fax (XXXX)

Feed (exact name)	<input type="checkbox"/> Compound feed <input type="checkbox"/> Single-component feed
Delivery date	
Batch identification number	
Number of delivery slip, if applicable	
Date of delivery slip, if applicable	
Date sample taken	
Place sample taken	
Unique sample identification (e.g. Sample ID)	
Date of analytical test report	
Species with finding of GMO content (e.g. soy, maize/corn, ...)	
Test result (PCR)*	Species: GMO positive, >0,1 ≤ 0,9% bzw. >0,9%; exact value: %, of which Event 1 % Event 2 % Species: GMO positive, >0,1 ≤ 0,9% bzw. >0,9%; exact value: %, of which Event 1 % Event 2 %
In the case of compound feed: Species with finding of GMO content declared as compound feed component?	<input type="checkbox"/> Yes: If declared: Quantity of species: % <input type="checkbox"/> No: Quantified amount of species: %
Agricultural operation affected, if applicable	

* % GMO DNA as a percentage of total DNA of the relevant species

As the feed supplier, we affirm for the abovementioned delivery:

A. The single-component feed(s) comprising the abovementioned batch is/are not subject to a labelling obligation in accordance with Regulations (EC) 1829/2003 and 1830/2003. For the purposes of the traceability of individual batches, evidence (including GMO test results, if applicable) for this statement is available, and can be provided upon request.

Yes (please check)

B. The GMO contamination identified is accidental or technically unavoidable.

Yes (please check)

