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 declarations\(^1\). 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.
Handling of positive feed GMO test results

(Feed)

**Annex V**

18.12.18

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**Evaluation of test results**

- Sampling at Feed Manufacturing, Logistics or Agricultural Production
  - GMO test, possibly including species quantification

**Stage Feed Manufacturing and Logistics**

- Initial result > 0.1 % GMO
  - Information of the animal feed supplier

**Stage Agricultural Production and Group Organization**

- Information of those involved (feed producer, feed supplier, agricultural facility and group organizer if applicable)
  - Initial result > 0.1 % GMO
    - Test retained sample / loading sample, if needed
  - Final result > 0.1 ≤ 0.9 % GMO
    - Assessment (if needed) is there a botanical contamination that need not be declared (see Slide 4h)
  - Final result > 0.9 % GMO

**Stage Food Processing / Preparation**

- Banning the batch from being labelled „VLOG geprüft“ at the factory / warehouse, or from being used for „Ohne Gentechnik“ production at the agricultural production stage

**Mandatory steps / measures**

- Replacement of feed without undue delay or discontinuation in „Ohne Gentechnik“ production

**Optional steps / measures**

- Feed not permissible for the „Ohne Gentechnik“ production
  - Feed permissible for „Ohne Gentechnik“ production

---

3 or <0.006 % GMO for botanical contamination requiring no GMO declaration

2 No declaration of the feed supplier is required for „VLOG geprüft“ feed. However, the feed supplier must be informed about the positive analytical result by the company.
Standardised forwarding and requesting of information in the event of positive feed GMO test results

Content
1. >0.9% GMO .................................................................................................................................................4
   1a. >0.9% GMO information to feed supplier ...............................................................................................4
   1b. >0.9% GMO; in the case of rejection: notice and form letter to supplier .....................................................6
2. >0,1 ≤ 0.9% GMO ...........................................................................................................................................8
   2a. >0,1 ≤ 0.9% GMO: letter to feed supplier ..................................................................................................8
   2b. >0.9 % / ≤ 0.9% GMO: form letter to feed supplier ...................................................................................9
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:

<table>
<thead>
<tr>
<th>Feed (exact name)</th>
<th>□ Compound feed</th>
<th>□ Single-component feed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery date</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Batch identification number</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of delivery slip, if applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of delivery slip, if applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date sample taken</td>
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<tr>
<td>Place sample taken</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique sample identification (e.g. Sample ID)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of test report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Species with finding of GMO content (e.g. soy, maize/corn, ...)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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?
  □ Yes:
  If declared: Quantity of species: %
  □ 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.
If shipped by group organiser, please also include the following:
We have notified the affected farmer of the result. Please contact without undue delay 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 animal health, the feeding can – in agreement with the certification body – be continued in the needed amount until new feed is available.
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.

<table>
<thead>
<tr>
<th>Feed (exact name)</th>
<th>□ Compound feed</th>
<th>□ Single-component feed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery date</td>
<td></td>
<td></td>
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<tr>
<td>Batch identification number</td>
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<td></td>
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<tr>
<td>Number of delivery slip., if applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of delivery slip, if applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date sample taken</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Place sample taken</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique sample identification (e.g. Sample ID)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of analytical test report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Species with finding of GMO content (e.g. soy, maize/corn, ...)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**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?
- □ Yes:
  - If declared: Quantity of species: %
- □ 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
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:

<table>
<thead>
<tr>
<th>Impacted Feed (exact name)</th>
<th>□ Compound feed</th>
<th>□ Single-component feed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery date</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Amount of delivered feed</td>
<td>kg</td>
<td></td>
</tr>
</tbody>
</table>

- 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 delay\(^3\) 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 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.
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:

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<td></td>
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</table>

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?

□ Yes:
If declared: Quantity of species: %
□ 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
Positive feed GMO test result of XXX / Sample XXX:
Confirmation form for feed supplier

Please send back by email or fax (XXXX)

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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?
□ Yes:
If declared: Quantity of species: %
□ 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)
Our business is certified in accordance with the current VLOG “Ohne Gentechnik” standard, which also covers the abovementioned feed.

Please check: ☐ Yes ☐ No

If no: The following measures are implemented in our business in order to prevent carryover of GMO material:

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Date

Signature and seal of feed supplier