“Ohne Gentechnik”
Production and Certification Standard

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Verband Lebensmittel ohne Gentechnik e.V.
www.ohnegentechnik.org

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## Overview Table of Contents

<table>
<thead>
<tr>
<th>Part</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part A: General</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Part B: Logistics</td>
<td></td>
<td>20</td>
</tr>
<tr>
<td>Part C: Feed Manufacturing</td>
<td></td>
<td>34</td>
</tr>
<tr>
<td>Part D: Matrix Certification for the Logistics and Feed Manufacture Stages</td>
<td></td>
<td>47</td>
</tr>
<tr>
<td>Part E: Agriculture</td>
<td></td>
<td>57</td>
</tr>
<tr>
<td>Part F: Agricultural Group Organisation</td>
<td></td>
<td>84</td>
</tr>
<tr>
<td>Part G: Food Processing/Preparation</td>
<td></td>
<td>95</td>
</tr>
<tr>
<td>Part H: Retail Stage – Sale of Bulk Food of Animal Origin</td>
<td></td>
<td>106</td>
</tr>
<tr>
<td>Part I: Requirements for Certification Bodies, Auditors, Evaluators and Certifiers</td>
<td></td>
<td>116</td>
</tr>
<tr>
<td>Part J: Requirements for Laboratories and Tests</td>
<td></td>
<td>120</td>
</tr>
<tr>
<td>Glossary – Definition of Terms</td>
<td></td>
<td>125</td>
</tr>
<tr>
<td>Annexes</td>
<td></td>
<td>130</td>
</tr>
<tr>
<td>Literature</td>
<td></td>
<td>131</td>
</tr>
<tr>
<td>Data protection</td>
<td></td>
<td>132</td>
</tr>
</tbody>
</table>
List of Tables and Images

Table 1: Evaluation of requirements ........................................................................................................................................... 15
Table 2: Audit Evaluation and Certificate Issuance .......................................................................................................................... 17
Table 3: Yearly minimum of sampling/testing at the Trading of Feed sub-stage ................................................................. 33
Table 4: Yearly minimum sampling/testing at the Trading of Feed sub-stage ................................................................. 33
Table 5: Yearly minimum sampling/testing at the Feed Production sub-stage ................................................................. 43
Table 6: Yearly minimum number of samples/tests for incorporation into “VLOG geprüft” quality of single-component feed not subject to compulsory labelling .......................................................... 43
Table 7: Minimum feeding conversion period according to EGGenTDurchfG (see EGGenTDurchfG, most recently amended by Art. 58 V of 31 August 2015 | 1474) .................................................. 72
Table 8: Yearly minimum of sampling at the mobile/stationary grinding and mixing facilities sub-stage ............................................................................................................................................. 77
Table 9: Minimum number of tests in the sub-stage mobile/stationary grinding and mixing facility in the respective audit interval ...................................................................................................................................... 79
Figure 3: Audit intervals of agricultural operations applicable to group certifications .......................................................... 89
Table 10: Annual minimum number of samples of “ohne Gentechnik” incoming goods .......................................................... 104
# Part A: General

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>A 1</td>
<td>Introduction</td>
<td>5</td>
</tr>
<tr>
<td>A 1.1</td>
<td>Purpose of the Standard</td>
<td>5</td>
</tr>
<tr>
<td>A 1.2</td>
<td>VLOG as Standard-Issuing Body</td>
<td>5</td>
</tr>
<tr>
<td>A 1.2.1</td>
<td>Use of the “Ohne GenTechnik” Seal</td>
<td>5</td>
</tr>
<tr>
<td>A 1.2.2</td>
<td>Use of the “VLOG geprüft” Seal for Feed</td>
<td>6</td>
</tr>
<tr>
<td>A 1.3</td>
<td>Legal Basis &amp; Interpretation</td>
<td>6</td>
</tr>
<tr>
<td>A 1.3.1</td>
<td>Regulations (EC) No. 1829/2003 and 1830/2003</td>
<td>7</td>
</tr>
<tr>
<td>A 1.3.2</td>
<td>EC Genetic Engineering Implementation Act (EGGenTDurchfG)</td>
<td>8</td>
</tr>
<tr>
<td>A 1.4</td>
<td>Additional Requirements for Processing Aids and other Substances</td>
<td>8</td>
</tr>
<tr>
<td>A 2</td>
<td>Scope of Applicability of the Standard</td>
<td>9</td>
</tr>
<tr>
<td>A 2.1</td>
<td>Definition of Stages in the Standard</td>
<td>9</td>
</tr>
<tr>
<td>A 3</td>
<td>Certification Types and Certification Process</td>
<td>10</td>
</tr>
<tr>
<td>A 3.1</td>
<td>Audit Types</td>
<td>10</td>
</tr>
<tr>
<td>A 3.2</td>
<td>Types of Certification</td>
<td>11</td>
</tr>
<tr>
<td>A 3.2.1</td>
<td>Commissioning External Service Providers</td>
<td>12</td>
</tr>
<tr>
<td>A 3.2.2</td>
<td>Requirements for Individual Certification</td>
<td>12</td>
</tr>
<tr>
<td>A 3.3</td>
<td>Applying for Certification</td>
<td>12</td>
</tr>
<tr>
<td>A 3.4</td>
<td>Scope of Applicability/Certification</td>
<td>12</td>
</tr>
<tr>
<td>A 3.5</td>
<td>Risk Grading of Businesses</td>
<td>13</td>
</tr>
<tr>
<td>A 3.6</td>
<td>Planning of Audits</td>
<td>14</td>
</tr>
<tr>
<td>A 3.7</td>
<td>Performance of the Audit</td>
<td>14</td>
</tr>
<tr>
<td>A 3.8</td>
<td>Audit Documentation</td>
<td>15</td>
</tr>
<tr>
<td>A 3.9</td>
<td>Evaluation of Requirements</td>
<td>15</td>
</tr>
<tr>
<td>A 3.9.1</td>
<td>Determination and Handling of Corrective Actions</td>
<td>16</td>
</tr>
<tr>
<td>A 3.9.2</td>
<td>Audit Evaluation and Certification Conditions</td>
<td>16</td>
</tr>
<tr>
<td>A 3.10</td>
<td>Evaluation/Review by the Certification Body</td>
<td>17</td>
</tr>
<tr>
<td>A 3.11</td>
<td>Certificate Issuance</td>
<td>18</td>
</tr>
<tr>
<td>A 3.11.1</td>
<td>Requirements for Certificate Issuance</td>
<td>18</td>
</tr>
<tr>
<td>A 3.11.2</td>
<td>Requirements for VLOG Certificates</td>
<td>18</td>
</tr>
<tr>
<td>A 3.11.3</td>
<td>Validity Period of the VLOG Certificate</td>
<td>18</td>
</tr>
</tbody>
</table>
A 3.11.4 Transferring Certification by Change of Ownership or of Certification Body........ 18

A 4  Integrity Programme .................................................................................................. 19

A 5  Review of the VLOG Standard .................................................................................. 19


A 1  Introduction

The German 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". Only the designation “ohne Gentechnik” may be used to indicate that a food product advertised or distributed on the German market was produced without the use of genetic engineering.

A 1.1  Purpose of the Standard

The VLOG Standard details the requirements for “VLOG geprüft” feed or “ohne Gentechnik” food production and is designed to harmonise the review of process and quality assurance systems.

This Standard serves as the basis for issuance by VLOG of a licence to use the “Ohne GenTechnik” and “VLOG geprüft” seals. Moreover, it assists businesses in developing a risk management system.

The present Standard is intended for

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

In addition to agricultural operations and logistics companies, certification under this Standard can also be extended to food producers and processors and feed manufacturers, separate from the aforementioned product labelling option (“Ohne GenTechnik” seal/“VLOG geprüft” seal).

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 preferred 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 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, businesses of the food and feed industry, 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), which is a registered trademark owned by the Federal Republic of Germany. On the basis of an exclusive agreement with the Federal Ministry of Nutrition and Agriculture, VLOG is solely 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.
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 along with those pursuant to the national law of the country where the product is being placed on the market. Assessing the legality of using the “Ohne GenTechnik” seal outside of Germany is the sole responsibility of the licensee.

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

A 1.2.2 Use of the “VLOG geprüft” Seal for Feed

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 certification of compliance with the present Standard or a standard recognised as its equivalent.

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-

- 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
- 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: https://www.ohnegentechnik.org/faq and 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 are exempt from labelling obligations according to Regulations (EC) No. 1829/2003 and No. 1830/2003 if the following 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% is 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” [Link].

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 business 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 raw materials to qualify for the “ohne Gentechnik”, the requirements go significantly beyond the absence of a labelling obligation according to Regulations (EC) No. 1829/2003 and No. 1830/2003.

According to EGGenTDurchfG, in the production of “ohne Gentechnik” food, no GMO ingredients and additives may be used, nor may they 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 by 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. Appropriate steps are demonstrably undertaken to avoid and prevent the presence of any genetically modified material (see “Guideline for the Control of 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 by (or with the help of) GMOs need not be labelled and may be used without restrictions.

**A 1.4 Additional Requirements 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. 3a (5), 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 for the stages mentioned in A 2.1 along with associated services and activities in the EU. The VLOG Standard and the EGGenTDurchfG are based on the labelling provisions of Regulations (EC) 1829/2003 and 1830/2003 and therefore may not be applied on an analogue 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 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 H of the Standard.

If a business is applying for certification according to the VLOG Standard for activities in 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 of feed/food
  - Storage, handling of feed/food
  - Trade, drop shipping of feed/food
    - if applicable, including conversion of single-component feed to “VLOG geprüft”

- Feed manufacturing (Part C)
  - Feed manufacturing, processing
  - Mobile grinding and mixing facilities

(Transport, storage, handling, trading of feed → is assigned to the Logistics stage (Part B)

- Matrix certification (Part D)
  - Feed manufacturing/processing
  - Mobile grinding and mixing facilities
  - Transport of feed/food
  - Storage, handling of feed/food
  - Trade, drop shipping of feed/food
    - if applicable, including conversion of single-component feed to “VLOG geprüft”

- Agriculture (Part E)
  - Animal production
Agricultural Group organisation (Part F)

• Food processing/preparation (Part G)

– Food processing/preparation

(Transport, storage/handling and trading of feed → is assigned to the Logistics stage (Part B)

• Retail – Sale of bulk food of animal origin (Part H)

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 business 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:

• Logistics stage, feed manufacturing, group organiser, matrix organiser, food processing/preparation, retail - sale of bulk animal food products:

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.

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

If the business 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 permissible if a 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 business wants to include new product groups, processes, production lines, etc. into the scope of applicability, 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, processes, etc. 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 of the VLOG Standard are met, the business 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 forth in Chapters B 2.2, C 2.1, D 2.3, E 2.2, F 2.3, G 2.2 and H 2.2.1.

Audit on suspicion:
Audits on suspicion serve to investigate suspected non-compliance; the auditor will only assess selected criteria of the VLOG Standard 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 seq.

- Matrix certification for logistics and feed manufacturing (for associated sites in the areas of logistics and feed production): For requirements and procedure see Chapter D 2.1.

- Group certification in agriculture (for associated agricultural operations):
  For requirements and procedure see Chapter F 2
• Group certification in retail (for associated branch operations): For requirements and procedure see Chapter H 2

A 3.2.1 Commissioning External Service Providers

If the business outsources activities subject to certification to external service providers ("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 must be coordinated with the VLOG Head Office.

A 3.2.2 Requirements for Individual Certification

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

• Signed contract with a VLOG-recognised certification body
• Signed Standard Usage Agreement\(^1\) with VLOG.

A 3.3 Applying for Certification

The business applies for certification with a VLOG-recognised certification body and specifies the desired scope of applicability for certification (stage/sub-stage/product group). The business and the VLOG-recognised certification body enter into a written agreement 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

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\(^1\) Known as “Certification Agreement” until 20 June 2017. A Standard Usage Agreement signed by VLOG must be in place prior to the issuance of the certificate.
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 XII.

- For food products, product group 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 “Leitsätze für Fleisch- und Fleischerzeugnisse” (Guidelines for Meat and Meat Products), or a descriptive designation which may not be misleading.

- 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.

- Feed is to be specified in accordance with Annex XII.

- If the scope of applicability concerns the Feed Stage, Mobile Grinding and Mixing Facilities Sub-stage, then the license plates of the mobile grinding and mixing facilities to be audited within the scope of the VLOG certification will be listed in the scope of applicability of the VLOG certificate.

If new product groups, processes, etc. are to be included within the scope of applicability, the certification body will 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-based 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\(^2\) will evaluate the organisation as well as the physical and temporal processes in the entire business. The use of GMOs and non-compliant raw materials in the business will result in a higher risk grading.

- Businesses in 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, E 2.1 and G 2.1 based on risks.

- In the area of feed, grading into risk categories will be 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.

\(^2\) Or group organizer, in the case of group certifications
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 business 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.

**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 audit schedule
- Clarification of fundamental questions regarding the audit schedule

**Following the document and facility inspection (sequence to be defined by the auditor):**

**Document inspection:**

- Review of the facility description and verification of risk grading
- Inspection of the relevant business documents (e.g. organisational chart/organisation, quality management system, bills of lading)
- Verification of compliance with the Standard requirements (e.g. labelling of raw materials/feed, risk management, etc.)
- Mass flow control (input and output plausibility check in the facility)

**Facility inspection:**

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

**Grinding and mixing facilities:**

- Mobile grinding and mixing facilities: At least two of the facilities that are registered for VLOG certification will be inspected by the auditor (in particular, visual inspection and comparison of documents). The selection is performed in a risk-based manner. If the business only uses one facility for “VLOG geprüft” production, then this facility is to be inspected.
• Stationary grinding and mixing facilities: The inspection includes all facilities associated with the agricultural operation.

Closing meeting:
• Summary of findings/deviations and result

Corrective actions may be agreed in the final meeting and established in writing. This will not affect the audit results.

If corrective actions are determined and agreed at the latest 4 weeks after the audit (see A 3.9.1), this must also be documented in writing and before the certificate is issued.

The auditor is authorised to take additional samples and/or carry out other GMO tests in accordance with risks or in suspicious cases.

**A 3.8 Audit Documentation**

The auditor documents the evaluation of the requirements and, if applicable, any identified deviations in the stage-relevant VLOG checklists in their most recent version. The certification body may create and use checklists in a customised format on the basis of the current VLOG checklists, provided the content of the checklist, the wording of the audit items and the underlying results calculation are used without change.

At the end of the audit, the completed VLOG checklist(s) are signed by the auditor and the business.

**A 3.9 Evaluation of Requirements**

The auditor examines and evaluates the compliance with each VLOG Standard requirement.

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

<table>
<thead>
<tr>
<th>Grading</th>
<th>Description</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Full compliance with a requirement</td>
<td>10 Points</td>
</tr>
<tr>
<td>B</td>
<td>Minor to moderate deviations from the requirement</td>
<td>5 Points</td>
</tr>
<tr>
<td>C</td>
<td>Non-compliance or major deviation from the requirement</td>
<td>- 10 points</td>
</tr>
<tr>
<td>N.A.</td>
<td>Not applicable</td>
<td>-</td>
</tr>
<tr>
<td>Risk</td>
<td>Major deviation, meaning that a risk to “ohne Gentechnik”/“VLOG geprüft” labelling cannot be ruled out.</td>
<td>- 15% of total points³</td>
</tr>
<tr>
<td>KO</td>
<td>Requirements with a critical impact on “ohne Gentechnik/VLOG geprüft” labelling in case of failure to comply.</td>
<td>Audit not passed</td>
</tr>
</tbody>
</table>

Table 1: Evaluation of requirements

A “risk” grade may be assigned to all requirement items not defined as KO requirements.

---

³15% of the points total will be deducted for each criterion classified as a risk.
Risk grading is assigned to all deviations that endanger the safety of the “ohne Gentechnik” system, for example, sampling and testing plan not adequately implemented.

KO requirements may only be assigned an A, B, or KO grade. They 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). A KO requirement may not be graded N.A.

The auditor must demonstrably justify and document any deviations (B and C grading or Risk and KO grading) as well as the assessment N.A. in the checklist.

**A 3.9.1 Determination and Handling of Corrective Actions**

Procedure:

- The business must determine in writing corrective actions for all deviations identified (B and C grading, as well as Risk and KO grading) and the deadlines for their implementation.
- Corrective actions and deadlines must be presented by the audited business within 4 weeks after the audit and are to be approved by the competent certification body.

A certificate may only be issued after the business has defined corrective actions and their deadlines for all deviations and these have been released by the auditor/certification body.

**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-based procedure.

Monitoring of the implementation of the corrective actions lies within the scope of responsibility of the certification body; the statements (see Chapter A 3.9.2) and/or catalogue of sanctions per Annex X apply if the business is sanctioned and/or in connection with corrective actions.

Explanation: Corrective actions and deadlines may be agreed in the final meeting and documented in writing.

**A 3.9.2 Audit Evaluation and Certification Conditions**

The calculation of the audit result is based on the points specified in Chapter A 3.9.

<table>
<thead>
<tr>
<th>Audit results</th>
<th>Status</th>
<th>Certificate, measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>• more than 75% of the maximum points</td>
<td>passed</td>
<td>• certificate</td>
</tr>
<tr>
<td>• no KO grading</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• no GMOs which are not adventitious or technically avoidable were present in the “VLOG geprüft” and/or “ohne Gentechnik” production area</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Audit results</th>
<th>Status</th>
<th>Certificate, measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>• more than 75% of the maximum points</td>
<td>passed/not passed</td>
<td>• decision of the certification body about suspending the certificate, depending on the severity and relevance of the risk of deviation</td>
</tr>
<tr>
<td>• no KO grading</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• one risk grading</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Audit results | Status | Certificate, measures
--- | --- | ---
| • VLOG certificate will not be issued until corrective actions have been implemented and reviewed<br>• certification body decides whether a follow-up audit is necessary | • no certificate<br>• the certification body notifies VLOG within 2 working days about failure to pass audit<br>• a new routine audit must be performed |

- less than 75% of the maximum points<br>- no KO grading | not passed<br><br>• no certificate<br>• the certification body notifies VLOG within 2 working days about failure to pass audit<br>• a new routine audit must be performed |

- one or more KO gradings | not passed<br><br>• no certificate or, for group members, no inclusion in the certification of the group organiser<br>• certification body must suspend the current VLOG certificate within 2 working days<br>• certification body notifies VLOG about the KO grading within 2 working days (does not apply to group members who did not pass)<br>• the business must implement the required corrective actions before the certificate is re-issued<br>• a new routine audit must be performed |

Table 2: Audit Evaluation and Certificate Issuance

If the audit is not passed, VLOG will decide 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 3.10 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 notified as soon as possible.

The certification body is entitled to perform follow-up audits, audits on suspicion and additional checks (see Part H).
A 3.11 Certificate Issuance

A 3.11.1 Requirements for Certificate Issuance

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 with VLOG.

VLOG will only accept certificates according to the VLOG Standard from certification bodies that have concluded a Recognised Certifier Agreement with VLOG. Businesses or facilities undergoing initial certification are authorised to start shipping only after the issuance of the certificate.

Following a successful audit and taking into consideration Chapter A 3.9.2, the certification body will issue the business a certificate according to the VLOG Standard no later than 8 weeks after the audit. If the certificate is not issued within 8 weeks after the audit, a new routine audit is performed.

A 3.11.2 Requirements for VLOG Certificates

VLOG certificates will be issued according to Annex XI. 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 additional requirements 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 3.11.3 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 3.11.4 Transferring Certification by Change of Ownership or of 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. This requires the consent of the certified business as well as of the former and new certification bodies.

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.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.

For group certifications, the following additionally applies: The risk categories and audit intervals of the group members will remain in effect. The change of certification body does not result in a repeated initial certification (see Chapters F 2.2.2 and F 2.2.3), but triggers a follow-up certification (see Chapter F 2.3).

### A 4 Integrity Programme

The Integrity Programme comprises various measures intended to ensure the quality and correct implementation of the VLOG Standard. The selection is performed, among others, in a risk-based manner or by reason of complaints. Compliance with Standard requirements is verified as part of on-site inspections of Standard participants. The Integrity Programme also includes a review of certification bodies and auditors. 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. 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. Inspections may also be performed without advance notice.

### 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 appoints the members of the Standard Technical Working Group.
Part B: Logistics

B 1 Stage Definition and Mandatory Certification ................................................................. 21
B 2 Details of the Certification Procedure .................................................................................. 26
  B 2.1 Risk Grading .................................................................................................................. 26
  B 2.2 Audit Frequency .............................................................................................................. 27
  B 2.3 KO Requirements .......................................................................................................... 27
B 3 General Requirements for Businesses .................................................................................. 27
  B 3.1 Facility Description ........................................................................................................ 27
  B 3.2 Assignment of Responsibilities/Organisational Chart .................................................. 27
  B 3.3 Risk Management (KO) ............................................................................................... 28
  B 3.4 Commissioning External Service Providers ................................................................. 28
  B 3.5 Segregation of Goods Flows / Exclusion of Commingling (KO) ..................................... 28
  B 3.6 Handling of Non-Compliant Feed, Raw Materials and Products (KO) ......................... 29
  B 3.7 Outgoing Goods Control/Labelling of Bills of Lading .................................................. 29
  B 3.8 Traceability (KO) .......................................................................................................... 30
  B 3.9 Complaint Management .............................................................................................. 30
  B 3.10 Goods Recall ............................................................................................................... 30
  B 3.11 Crisis Management (KO) ............................................................................................ 30
  B 3.12 Corrective Action/Ongoing Improvement Process ...................................................... 31
  B 3.13 Documentation and Retention Period ....................................................................... 31
  B 3.14 Staff Training .............................................................................................................. 31
  B 3.15 Internal Audits ............................................................................................................. 31
B 4 Specific Requirements for Storage and Handling .............................................................. 31
  B 4.1 Incoming Goods Inspection ........................................................................................ 31
B 5 Specific Requirements for Trade ......................................................................................... 32
  B 5.1 Incoming Goods Inspection ........................................................................................ 32
  B 5.2 Sampling and Testing .................................................................................................... 32
    B 5.2.1 Sampling and Test Plan ........................................................................................... 32
    B 5.2.2 Frequency of Sampling and Testing ....................................................................... 33
    B 5.2.3 Handling of Positive Test Results ......................................................................... 33
The section below describes the specific rules and requirements for the Logistics Stage and its sub-stages.

### B 1 Stage Definition and Mandatory Certification

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification available, certification is not mandatory</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
</table>
| **Transport:** Transport means conveying goods from one place to another. | 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 risk management of a VLOG-certified business.  
  - **No** agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the transporter and the certified business. | 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 risk management of a VLOG-certified business.  
  - An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the transporter and the certified business.  
  For transport of sacked/tamper-resistant packaged “VLOG geprüft” feed and/or “ohne Gentechnik” food. | Yes | B 1-B 3, J 3 |
| **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 risk management of a VLOG-certified business.  
  - **No** agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the transporter and the certified business. | 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 risk management of a VLOG-certified business.  
  - An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the transporter and the certified business.  
  For transport of sacked/tamper-resistant packaged “VLOG geprüft” feed and/or “ohne Gentechnik” food. | Yes | B 1-B 3, J 3 |
<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification available, certification is not mandatory</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>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.</td>
<td>Yes</td>
<td>B 1-B 3, J 3</td>
<td></td>
</tr>
</tbody>
</table>

**Storage/handling:** The service of temporary storage of food and/or feed on behalf of a third party or storage in the business’ 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).

<table>
<thead>
<tr>
<th>Feed</th>
<th>For storage/handling of bulk “VLOG geprüft” feed</th>
<th>For storage/handling of sacked/tamper resistant packaged feed</th>
<th>Yes</th>
<th>B 1-B 4, J 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food</td>
<td>For storage/handling of bulk VLOG-certified food/ingredients of animal origin, provided they are not clearly labelled and there is a risk of commingling or tampering.</td>
<td>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.</td>
<td>Yes</td>
<td>B 1-B 4, J 3</td>
</tr>
</tbody>
</table>

**Trading:** 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.

<table>
<thead>
<tr>
<th>Feed</th>
<th>For traders that want to label bulk feed that is already VLOG-certified as “VLOG geprüft”* on the bills of lading.</th>
<th>Until 31 December 2019: For traders who transport bulk “VLOG geprüft” feed but who do not otherwise handle it within the meaning of</th>
<th>Yes</th>
<th>B 1-B 3, B 5, I 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sub-stage</td>
<td>Certification required according to VLOG Standard</td>
<td>Certification not required according to VLOG Standard</td>
<td>Certification available, certification is not mandatory</td>
<td>Requirements according to the Standard</td>
</tr>
<tr>
<td>-----------</td>
<td>-------------------------------------------------</td>
<td>---------------------------------------------------</td>
<td>------------------------------------------------------</td>
<td>-----------------------------------------</td>
</tr>
</tbody>
</table>
|           | For traders that want to convert not VLOG-certified single-component feed into “VLOG geprüft” quality and label it as such*. These traders are part of Stage B, but must meet the requirements of Stage C (activity subject to certification). | Regulation (EC) No. 178/2002, provided that both of the following two criteria are satisfied:  
- 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 risk analysis | Yes | C 1-C 3, C 5, I 3 |
<p>|           | For traders that sack and label bulk “VLOG geprüft”* feed, and that also want to designate it as “VLOG geprüft” on labels, declarations or bills of lading. | For trading of sacked/tamper resistant packaged feed. | Yes | B 1-B 3, B 5, J 3 |
| 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 | B 1-B 3, B 5, I 3 |</p>
<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification available, certification is not mandatory</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that:</td>
<td>For the trade of sealed VLOG-certified food between two VLOG-certified businesses. Provided that all of the following conditions are met:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• The trader issues delivery slips of its own for certified goods with the “VLOG” label and/or</td>
<td>• The goods are certified in accordance with the VLOG Standard</td>
<td>Yes</td>
<td>B 1-B 3, B 5, I 3</td>
<td></td>
</tr>
<tr>
<td>• The trader commissions non-VLOG-certified transporters or the transport site is not included in the risk management of a VLOG-certified business</td>
<td>• The originating dairy processing business is listed on the delivery slips</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The certified goods are labelled “VLOG” on the delivery slip</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The transporter is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• After loading, the vehicle tank is sealed by employees of the originating processing facility</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Drop shipping**: Drop shipping refers to the trading method wherein the goods are transported directly from the supplier 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. In contrast to drop shipping, the trader takes possession of the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification available, certification is not mandatory</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
</table>
| Feed      | For drop shipping of bulk “VLOG geprüft” feed  | Until 31 December 2019: For drop shippers of bulk “VLOG geprüft” feed, provided that all of the following statements are accurate:  
  - 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 risk analysis  
  - Commissioning of VLOG-certified transporters (if they are subject to a certification requirement according to B 1) | Yes | B 1-B 3, B 5, J 3 |
|           | as of 01 January 2020                           |                                                 |                                                   |                                        |
|           | as of 01 January 2019, unless all of the following requirements are satisfied:  
  - 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 risk analysis  
  - Commissioning of VLOG-certified transporters |                                                 |                                                   |                                        |

* (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 3.10) will be carried out according to the following criteria.

Risk Category 0

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

Risk Category 1

- There is a medium risk.
- Businesses and process steps with clear physical segregation during transport, storage, handling and trading of feed, raw materials and 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.
- Trading of feed, raw materials and 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 raw materials/products:

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

Risk Category 2

- High risk of commingling GMO-free feed, raw materials and products with such containing GMOs

Transport, storage, handling and trading of feed:

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

Transport, storage, handling as well as trading of raw materials/products:

- Businesses and process steps without physical segregation but with temporal segregation during transport, storage, handling and trading of raw materials/products for which an “ohne Gentechnik” label would be permissible and GMOs and/or raw materials/products which are produced from or by GMOs 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

In the case of individual certification in the Logistics stage, annual routine audits are performed.

Explanation: For matrix certifications in logistics and feed manufacturing, the audit follows the requirements of Chapter D 2.3.

B 2.3 KO Requirements

The following KO requirements have been determined:

- Risk management (B 3.3)
- Segregation of the flow of goods/exclusion of commingling (B 3.5)
- Handling of non-compliant feed, raw materials and products (B 3.6)
- Traceability (B 3.8)
- Crisis management (B 3.11)

B 3 General Requirements for Businesses

These requirements also apply to external service providers commissioned to transport, store and/or handle VLOG-certified raw materials/products or “VLOG geprüft” feed.

B 3.1 Facility Description

The facility description in accordance with Annex XIII is on file and up-to-date.

The certification body is promptly informed about major changes pertaining to VLOG certification.

Explanation: 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.

Major changes pertaining to VLOG certification include, e.g., risk grading, other products and/or processes.

B 3.2 Assignment of Responsibilities/Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.
Explanation: 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 Risk Management (KO)

Risk analysis
A documented risk analysis has been created for all relevant feed, raw materials, products, procedures and processes, including risk evaluation for “ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and feed for the “VLOG geprüft” and/or “ohne Gentechnik”/“VLOG” area (incl. countries of origin)
- Handling of feed, raw materials and products that meet the requirements for “ohne Gentechnik” or “VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “ohne Gentechnik” or “VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management
Preventive, monitoring and control actions have been introduced and implemented for the identified risks based on the risk analysis.

B 3.4 Commissioning External Service Providers

If activities in the areas of transport, storage and handling of VLOG-certified businesses that are subject to certification are commissioned to external, non-VLOG-certified service providers, these entities are to be included in the risk management (see Chapter B 3.3) of the business and must have signed an agreement to comply with the logistical requirements of the VLOG Standard (see Chapters A 3.2.1 and B 1).

External service providers performing activities subject to certification that are not included in the risk management of the VLOG-certified business must be certified according to the VLOG Standard or another recognised, equivalent standard.

B 3.5 Segregation of Goods Flows / Exclusion of Commingling (KO)

The physical and/or temporal separation of goods flows ensures that at no time feed, raw materials or products that are not suitable for “VLOG geprüft” or “ohne Gentechnik” labelling come into contact with the goods flow for feed, raw materials or products with “VLOG geprüft” or “ohne Gentechnik” labelling. Suitable procedural steps are to be in place to ensure that the carryover of GMO or non-compliant feed, raw materials and/or products is reduced to an at least adventitious and technically unavoidable level. In addition, all feed, raw materials and products must be clearly and consistently labelled in all process steps.

Transport vehicles are to be verifiably cleaned at least in the dry.
B 3.6 Handling of Non-Compliant Feed, Raw Materials and Products (KO)

An effective and documented procedure for handling non-compliant feed, raw materials and products is to be in place. At a minimum, it must include the following points:

- Labelling of affected feed, raw materials and products
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

Explanation: Non-compliant feed, raw materials and products must be identifiable, e.g., based on positive test results.

B 3.7 Outgoing Goods Control/Labelling of Bills of Lading

Feed

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2).

It must be clearly evident to which feed item the labelling refers.

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

“The following feed 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: …”

Food

VLOG-certified raw materials and products must be clearly labelled on all bills of lading using the wording “VLOG”.

It must be clearly evident to which raw material or product the labelling refers.

If no bills of lading are generated in specific systems (e.g. milk collection), a clear contractual stipulation for the delivery must ensure the above-listed labelling.

Only feed, raw materials and products that meet the requirements for “VLOG geprüft” or “ohne Gentechnik” labelling may be labelled as such.

Explanation: VLOG recommends the following wording for labelling food items that meet the requirements of the EGGentDurchfG, but are not included in the VLOG certification of the business:

“Ingredient suitable for the production of “Ohne Gentechnik”-labelled food”.
B 3.8 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed or “ohne Gentechnik”/”VLOG” raw materials and products can be clearly identified at all times.
- The goods flow of “VLOG geprüft” feed or “ohne Gentechnik” raw materials and products as well as quantity lists and evaluations can be generated within one working day to allow conclusions about goods flows and their plausibility.

Explanation: For this purpose, the following data is to be determined, among others:

- Information on supplier and delivery date
- Quantity
- Creation of batches, if applicable
- Information on delivery date and supplied customer

B 3.9 Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

B 3.10 Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, is to be in place for non-compliant feed or raw materials according to the VLOG Standard.

B 3.11 Crisis Management (KO)

An up-to-date and documented procedure for managing possible crisis situations that may impact product quality and the legitimacy of “VLOG geprüft” feed or “ohne Gentechnik” raw materials/products is to be in place. This procedure must be implemented and at a minimum includes:

- The steps to follow in the event of a crisis
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Regulation for the immediate notification of the VLOG head office, the certification body and any affected business partners and customers
- Legal advice (if required)

The crisis management procedure is to be tested internally at least once a year with regard to practicality, functionality and immediate implementation, with results documented.
B 3.12 Corrective Action/Ongoing Improvement Process

If internal audits, external audits, complaints management and non-compliant feed, raw materials and products lead to the identification of deviations from Standard requirements, the business must take corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.

B 3.13 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to the “VLOG geprüft”/"ohne Gentechnik” transport, storage, handling or trading 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.

Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, training documents etc.

B 3.14 Staff Training

All staff members involved in securing the operating procedures of relevance to “VLOG geprüft” or “ohne Gentechnik” labelling, including vehicle operators, must be instructed in the “VLOG geprüft” or “ohne Gentechnik” 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.

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

Explanation: The intensity of training varies depending on the staff member and is guided by the responsibility of the staff member for the proper flow of the “VLOG geprüft” or “ohne Gentechnik” operating procedure.

B 3.15 Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business-specific Standard requirements of the Logistics stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.

B 4 Specific Requirements for Storage and Handling

B 4.1 Incoming Goods Inspection

Feed

The bills of lading or in the case of packed goods the packaging are to be checked for the “VLOG geprüft” label within the scope of incoming goods inspection.

Raw materials

The bills of lading are to be checked for the “VLOG” label within the scope of incoming goods inspection.
B 5 Specific Requirements for Trade

B 5.1 Incoming Goods Inspection

The incoming goods procedure must ensure that all “VLOG” raw materials/products or “VLOG geprüft” feed meet(s) the requirements.

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

- the bills of lading or in the case of packed goods the packaging must be checked for “VLOG geprüft” and/or “VLOG” identification.
- the VLOG 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 “VLOG” only if this quality has been verifiably confirmed by the VLOG-certified supplier.

B 5.2 Sampling and Testing

Feed and/or raw materials and products that are relevant for the “VLOG geprüft” trade or “ohne Gentechnik” trade are subject to risk-based sampling and GMO testing in accordance with the following specifications.

B 5.2.1 Sampling and Test Plan

A written sampling and test plan must be available that describes the sampling and testing procedure.

The sampling and test plan, in compliance with the requirements listed in Part J, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification).
- Frequency and time intervals of sampling and GMO testing
- Determination of the parameters to be tested for (see Annex IV)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and test plan is to be implemented according to schedule.

Sampling and GMO testing will not be required if the traded feed and/or raw materials/products cannot be tested for genetic engineering for technical reasons.

In this case the test plan must provide for a risk analysis that concludes no need to sample/test any feed/raw materials/products.

Explanation: The VLOG homepage offers an assessment aid to determine the suitability of feed, raw materials and products for testing:
B 5.2.2 Frequency of Sampling and Testing

The annual sampling and testing frequency in the business must at least follow the specifications listed in Table 3 and Table 4. All samples are to be tested in a VLOG-recognised laboratory.

<table>
<thead>
<tr>
<th>List of VLOG products at site</th>
<th>Bulk “VLOG geprüft” feed</th>
<th>VLOG goods sacked goods</th>
</tr>
</thead>
<tbody>
<tr>
<td>List of all products at site</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Annual minimum number of samples/tests of “VLOG geprüft” outgoing goods</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>up to 10,000 t/year: 1 sample</td>
<td>no (additional) sampling</td>
</tr>
<tr>
<td></td>
<td>≥ 10,000 to 50,000 t/year: 2 samples</td>
<td></td>
</tr>
<tr>
<td>Bulk “VLOG geprüft” feed</td>
<td>≥ 50,000 to 100,000 t/year: 4 samples</td>
<td></td>
</tr>
<tr>
<td></td>
<td>≥ 100,000 to 200,000 t/year: 6 samples</td>
<td></td>
</tr>
<tr>
<td>Bulk “VLOG geprüft” feed +</td>
<td>≥ 200,000 to 300,000 t/year: 8 samples</td>
<td></td>
</tr>
<tr>
<td>bulk feed not subject to</td>
<td>for every additional 100,000 t: 2 additional samples</td>
<td></td>
</tr>
<tr>
<td>mandatory labelling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulk “VLOG geprüft” feed</td>
<td>up to 2,000 t/year: 1 sample</td>
<td>no (additional) sampling</td>
</tr>
<tr>
<td>Bulk “VLOG geprüft” feed +</td>
<td>&gt; 2,000 to 5,000 t/year: 3 samples</td>
<td></td>
</tr>
<tr>
<td>bulk feed subject to</td>
<td>&gt; 5,000 to 10,000 t/year: 5 samples</td>
<td></td>
</tr>
<tr>
<td>mandatory labelling</td>
<td>≥ 10,000 to 50,000 t/year: 10 samples</td>
<td></td>
</tr>
<tr>
<td></td>
<td>≥ 50,000 to 100,000 t/year: 15 samples</td>
<td></td>
</tr>
<tr>
<td></td>
<td>≥100,000 to 200,000 t/year: 20 samples</td>
<td></td>
</tr>
<tr>
<td></td>
<td>≥ 200,000 to 300,000 t/year: 25 samples</td>
<td></td>
</tr>
<tr>
<td></td>
<td>for every additional 100,000 t: 5 additional samples</td>
<td></td>
</tr>
</tbody>
</table>

Table 3: Yearly minimum of sampling/testing at the Trading of Feed sub-stage

Trading of “ohne Gentechnik” raw materials/products:

<table>
<thead>
<tr>
<th>Risk grading</th>
<th>Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>2 x per year</td>
</tr>
<tr>
<td>1</td>
<td>6 x per year</td>
</tr>
<tr>
<td>2</td>
<td>12 x per year</td>
</tr>
</tbody>
</table>

Table 4: Yearly minimum sampling/testing at the Trading of Feed sub-stage

Explanation: 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 Table 4.

B 5.2.3 Handling of Positive Test Results

Positive test results are to be treated according to Annex VI (for food) and Annex V (for feed).

The handling of the affected feed, raw materials and products in the business must follow the specifications of Chapter B 3.6.

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4 All feed quantities relate exclusively to “VLOG geprüft” feed or feed that is to be labelled as “VLOG geprüft”.

5 Abbreviation t = metric ton (1,000 kgs)
Part C: Feed Manufacturing

C 1 Stage Definition and Mandatory Certification
C 2 Details of the Certification Procedure
C 2.1 Audit Frequency
C 2.2 KO Requirements
C 3 General Requirements
C 3.1 Facility Description
C 3.2 Assignment of Responsibilities/Organisational Chart
C 3.3 Risk Management (KO)
C 3.4 Commissioning External Service Providers
C 3.5 Incoming Goods Inspection
C 3.6 Segregation of Goods Flows/Exclusion of Commingling (KO)
C 3.7 Handling of Non-Compliant Feed (KO)
C 3.8 Traceability (KO)
C 3.9 Complaint Management
C 3.10 Goods Recall
C 3.11 Crisis Management (KO)
C 3.12 Corrective Action/Continuous Improvement Process
C 3.13 Documentation and Retention Period
C 3.14 Staff Training
C 3.15 Internal Audits
C 4 Specific Requirements for Production
C 4.1 Reference Samples
C 4.2 Sampling and Testing
C 4.2.1 Sampling and Test Plan
C 4.2.2 Sampling and Testing Frequency
C 4.2.3 Handling of Positive Test Results
C 4.3 Outgoing Goods Control/Labelling of Bills of Lading
C 5 Specific Requirements for Transport, Handling, Storage, Trading of Feed
C 6 Specific Requirements for Mobile Grinding and Mixing Facilities
<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>C 6.1</td>
<td>Facility Description</td>
<td>44</td>
</tr>
<tr>
<td>C 6.2</td>
<td>Specific Measures to Rule out Technically Unavoidable Commingling</td>
<td>44</td>
</tr>
<tr>
<td>C 6.3</td>
<td>Mixing Documentation and Mixing Protocols</td>
<td>45</td>
</tr>
<tr>
<td>C 6.4</td>
<td>Sampling</td>
<td>45</td>
</tr>
<tr>
<td></td>
<td>C 6.4.1 Sampling Permission</td>
<td>45</td>
</tr>
<tr>
<td></td>
<td>C 6.4.2 Sampling Procedure</td>
<td>45</td>
</tr>
<tr>
<td>C 6.5</td>
<td>Transportation of Feed or Trading of Feed</td>
<td>45</td>
</tr>
<tr>
<td>C 6.6</td>
<td>Identification in Bills of Lading</td>
<td>45</td>
</tr>
<tr>
<td>C 6.7</td>
<td>Specific Corrective Measures</td>
<td>46</td>
</tr>
</tbody>
</table>
The section below describes the specific rules and requirements for the Feed Stage and its sub-stages.

### C 1 Stage Definition and Mandatory Certification

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification available, certification is not mandatory</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Feed manufacturing/processing:</strong> All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc. Also includes Private Labelling.</td>
<td>For bulk and/or sacked/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”*.</td>
<td>For bulk and/or sacked/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”.</td>
<td>Yes</td>
<td>C 1-C 3, fj 3</td>
</tr>
<tr>
<td>Compound and single-component feed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile grinding and mixing facility: Commercial, multi-operation production of feed using mobile equipment in agricultural operations.</td>
<td>For services rendered in “ohne Gentechnik” production that are to be advertised as “VLOG geprüft”*.</td>
<td>For services rendered in “ohne Gentechnik” production that are not to be advertised as “VLOG geprüft”.</td>
<td>No</td>
<td>C 1-C 3, C 6, J 3</td>
</tr>
<tr>
<td>Compound and single-component feed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Feed transport, feed storage/handling and feed trading are part of the Logistics Stage. The checklist for the Logistics Stage (see Annex XIV) must be applied.

* (Wording or seal according to Chapter A 1.2.2)
C 2 Details of the Certification Procedure

C 2.1 Audit Frequency

Routine audits are to be carried out annually.

C 2.2 KO Requirements

The following KO requirements have been determined:

- Risk management (C 3.3)
- Handling of non-compliant feed (C 3.7)
- Segregation of the flow of goods/exclusion of commingling (C 3.6)
- Traceability (C 3.8)
- Crisis management (C 3.11)

C 3 General Requirements

C 3.1 Facility Description

The facility description in accordance with Annex XV must be on file and up-to-date.

The certification body is to be promptly informed about major changes pertaining to the VLOG certification.

Explanation: 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 to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

Major changes pertaining to the VLOG certification include, e.g., risk grading, other feed and/or processes.

C 3.2 Assignment of Responsibilities/Organisational Chart

A current organisational chart must show responsibilities and assigned substitute rules.

Explanation: 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 Risk Management (KO)

Risk analysis

A documented risk analysis is to be in place for all relevant feed, procedures and processes, including risk evaluation for “VLOG geprüft” labelling (analogous to the HACCP concept).
The risk analysis at a minimum must cover the following points:

- Feed for the “VLOG geprüft” area (incl. countries of origin)
- Risk grading of feed (risk-prone/not risk-prone) for the “VLOG geprüft” area

An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business:

- Handling of feed that meets the requirements for “VLOG geprüft” labelling and feed that does not meet the requirements for “VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management
Preventive, monitoring and control measures must be introduced and implemented for risks identified in the risk analysis.

C 3.4 Commissioning External Service Providers

If VLOG-certified businesses commission external, non-VLOG-certified service providers with activities in the areas of feed manufacturing, transport, storage and handling subject to certification, these entities are to be included in the risk management (see C 3.3) of the business and must sign an agreement to comply with the logistical requirements of the VLOG Standard (see Chapters A 3.2.1, B 1 and C 1).

In the Feed Manufacturing Stage, compliance with the agreement is to be reviewed at least once a year by the commissioning business, with results documented. External service providers performing activities subject to certification that are not included in the risk management of the VLOG-certified business must be certified according to the VLOG Standard or another recognised, equivalent standard.

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.

Incoming goods inspection of VLOG-certified feed:

- The incoming goods inspection checks that the bills of lading or in the case of packed goods the packaging contain the “VLOG geprüft” label and/or the “VLOG geprüft” seal (see Figure 2). A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

Incoming goods inspection of feed not certified by VLOG

A supplier confirmation must be available for all feed, feed additives and processing aids that are classified by the business as risk-prone (see Chapter C 3.3). This can be achieved by:

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

Explanation: VLOG recommends the following wording for the declaration of non-VLOG-certified feed exempt from mandatory labelling: “The following feed 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: ...”

C 3.6 Segregation of Goods Flows/Exclusion of Commingling (KO)

The physical and/or temporal separation of goods flows must ensure that feedstuffs that are not suitable for “VLOG geprüft” or “ohne Gentechnik” labelling at no time come into contact with the goods flow for feed with “VLOG geprüft” or “ohne Gentechnik” labelling. Adequate procedural steps are to be in place to ensure that the carryover of GMO or non-compliant feed is reduced to an at least adventitious and technically unavoidable level. In addition, all feed must be clearly and consistently labelled on all process steps.

C 3.7 Handling of Non-Compliant Feed (KO)

An effective and documented procedure for handling non-compliant feed is to be in place. At a minimum, it must include the following points:

• Labelling of the affected feed
• Notification of customers/buyers and suppliers
• Error management
• Initiation, monitoring, evaluation and documentation of corrective actions
• Blocking and release of feed
• Documentation and analysis of incidents

The responsibilities are defined in the procedure.

Explanation: Non-compliant feed must be identifiable, e.g. based on positive test results.

C 3.8 Traceability (KO)

The introduced/installed traceability system must guarantee that:

• All “VLOG geprüft” feed existing in the business/at the controlled site can be clearly identified at all times.
• The goods flow of “VLOG geprüft” feed as well as quantity lists and evaluations can be generated within one working day to allow conclusions about goods flows and their plausibility.
Explanation: For this purpose, the following data is determined, among others:

- Information on supplier and delivery date
- Quantity
- Batch/lot formation, if applicable (including re-working)
- Information on delivery date and supplied customer

C 3.9 Complaint Management

A documented system must be introduced to deal with complaints and feedback and comments associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

C 3.10 Goods Recall

An effective and documented procedure for the goods recall, including determination of responsibilities, must be in place for non-compliant feed according to the VLOG Standard. This must include the immediate written notification of customers.

C 3.11 Crisis Management (KO)

An up-to-date and documented procedure for managing possible crisis situations that may impact product quality and the legitimacy of “VLOG geprüft” feed is to be in place. This procedure at a minimum includes:

- The steps to follow in the event of a crisis
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Regulation for the immediate notification of the VLOG head office, the certifier and any affected business partners and customers
- Legal advisement (if required)

The crisis management procedure is periodically tested internally, at least once a year, with regard to practicality, functionality and immediate implementation, with results documented.

C 3.12 Corrective Action/Continuous Improvement Process

If internal audits, external audits, complaints management and non-compliant products result in the identification of deviations from Standard requirements, the business must take corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.
C 3.13  Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not possible. All documents relating to the “VLOG geprüft” labelling process are to be retained for the following period, unless statutory provisions require a longer retention period: minimum shelf life of the lot + one year, but not less than two years.

Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, production and goods flow records (including re-work), training documents etc.

C 3.14  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 and at least once a year.

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

Explanation: 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” operating procedure.

C 3.15  Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business-specific Standard requirements of the Feed Stage. The internal auditors must have the corresponding expertise and will not audit their own activities. The results are to be documented in writing and communicated to the affected units.

C 4  Specific Requirements for Production

C 4.1  Reference Samples

The business retains 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 are retained for a period of time appropriate to the intended purpose and product perishability of the feed.

Explanation: This applies both to feed delivered in bulk and to packaged feed.

C 4.2  Sampling and Testing

Risk-based sampling and GMO testing is to be performed according to Chapter C 3.3 for the manufacture orlabelling of relevant “VLOG geprüft” feed in accordance with the following specifications.
C 4.2.1 Sampling and Test Plan

A written sampling and test plan on the basis of the business-specific risk grading (see Chapter C 3.3) for feed in “VLOG geprüft” manufacturing is to be on file that describes the sampling and test procedure.

The sampling and test plan, in compliance with the requirements listed in Part J, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification)
- Frequency and periodic distribution of sampling and GMO testing
- Determination of the parameters to be tested for (see Annex IV)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and test plan is to be implemented according to schedule.

Explanation: Sampling and GMO testing is not required if the utilised feed cannot be tested for genetic engineering for technical reasons.

In this case the test plan must provide for a risk analysis reaching the conclusion that it is not necessary to sample/analyse any raw materials/feed.


Sampling and Testing Frequency

The annual sampling and testing frequency in the business must at least follow the specifications listed in Table 5 and Table 6.

All samples are to be tested in a VLOG-recognised laboratory.

<table>
<thead>
<tr>
<th>Area</th>
<th>Sampling/GMO testing at “VLOG geprüft” incoming goods</th>
<th>Sampling/GMO testing at “VLOG geprüft” outgoing goods*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Production Sample material</td>
<td>Single-component feed</td>
<td>VLOG-certified single-component feed and/or VLOG-certified compound feed</td>
</tr>
</tbody>
</table>
| Production entirely not subject to compulsory labelling | For every batch of single-component feed graded as risk-prone | up to 10,000 t/year: 1 sample/test  
≥ 10,000 to 50,000 t/year: 2 samples/tests  
≥ 50,000 to 100,000 t/year: 4 samples/tests  
≥100,000 to 200,000 t/year: 6 samples/tests  
≥200,000 to 300,000 t/year: 8 samples/tests  
for every additional 100,000 t: 2 additional samples/tests |
| Dual production               | For every batch of single-component feed graded as risk-prone | up to 2,000 t/year: 1 sample/test  
> 2,000 to 5,000 t/year: 3 samples/tests  
> 5,000 to 10,000 t/year: 5 samples/tests |
Area | Sampling/GMO testing at “VLOG geprüft” incoming goods | Sampling/GMO testing at “VLOG geprüft” outgoing goods*
---|---|---
Production | Single-component feed | VLOG-certified single-component feed and/or VLOG-certified compound feed

| ≥10,000 t/year: 10 samples/tests | ≥50,000 t/year: 15 samples/tests | ≥100,000 t/year: 20 samples/tests |
| ≥200,000 t/year: 25 samples/tests | for every additional 100,000 t: 5 additional samples/tests |

Table 5: Yearly minimum sampling/testing at the Feed Production sub-stage

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

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

<table>
<thead>
<tr>
<th>Business trades in/handles</th>
<th>Area</th>
<th>Sampling at “VLOG geprüft” incoming goods</th>
<th>Samples in “VLOG geprüft” outgoing goods</th>
</tr>
</thead>
<tbody>
<tr>
<td>Only bulk “VLOG geprüft” feed and/or bulk feed not subject to compulsory labelling</td>
<td>For every batch of single-component feed graded as risk-prone</td>
<td>up to 10,000 t/year: 1 sample</td>
<td>≥10,000 t/year: 2 samples</td>
</tr>
<tr>
<td></td>
<td></td>
<td>≥50,000 t/year: 4 samples</td>
<td>≥100,000 t/year: 6 samples</td>
</tr>
<tr>
<td></td>
<td></td>
<td>≥200,000 t/year: 8 samples</td>
<td>for every additional 100,000 t: 2 additional samples</td>
</tr>
<tr>
<td>Only bulk “VLOG geprüft” feed and bulk feed subject to compulsory labelling, plus, if applicable, bulk feed not subject to compulsory labelling</td>
<td>For every batch of single-component feed graded as risk-prone</td>
<td>up to 2,000 t/year: 1 sample</td>
<td>&gt;2,000 t/year: 3 samples</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt;5,000 t/year: 5 samples</td>
<td>≥10,000 t/year: 10 samples</td>
</tr>
<tr>
<td></td>
<td></td>
<td>≥50,000 t/year: 15 samples</td>
<td>≥100,000 t/year: 20 samples</td>
</tr>
<tr>
<td></td>
<td></td>
<td>≥200,000 t/year: 25 samples</td>
<td>for every additional 100,000 t: 5 additional samples</td>
</tr>
</tbody>
</table>

Table 6: Yearly minimum number of samples/tests for incorporation into “VLOG geprüft” quality of single-component feed not subject to compulsory labelling

---

6 All feed quantities relate exclusively to feed that is either intended to be used in “VLOG geprüft” production and/or is be labelled as “VLOG geprüft”, depending on the respective facility.

7 The transfer is only feasible for goods that can be tested for GMOs
C 4.2.2 Handling of Positive Test Results

Positive feed test results are to be treated according to Annex V. The handling of the affected feed in the business must follow the specifications of Chapter C 3.7.

C 4.3 Outgoing Goods Control/Labelling of Bills of Lading

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging, using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2). It must be clearly evident to which feed item the labelling refers.

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

“The following feed 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: ...”

C 5 Specific Requirements for Transport, Handling, Storage, Trading of Feed

If the business performs activities in the area of transport, storage, handling and trading of feed that are subject to the certification obligation, the relevant requirements according to Chapters B 2 to B 5 must be complied with. The checklist for the Logistics Stage (see Annex XIII) must be applied.

C 6 Specific Requirements for Mobile Grinding and Mixing Facilities

C 6.1 Facility Description

The facility description in accordance with Annex XVII must be on file and up-to-date.

C 6.2 Specific Measures to Rule out Technically Unavoidable Commingling

According to Chapter C 3.6, measures must be defined, documented and implemented for each facility to prevent the carryover of GMO feed from previous mixtures during the production of “VLOG geprüft” mixtures. Other risk factors such as the age of the facilities and repairs will be taken into account. Removal of residues and purging are to be documented in the mixing protocol according to Chapter C 6.3/Annex XXIX.

The proper operation of facilities is ensured. Each facility is

- cleaned pursuant to the business’s cleaning plan.

Maintenance and cleaning are to be documented.
C 6.3  Mixing Documentation and Mixing Protocols

The sequence of the mixtures and the individual mixtures are documented daily for each facility. From the documentation it must be evident which mixtures are those with feed that is subject to compulsory labelling and which ones are “VLOG geprüft” mixtures.

After finishing the mixture, each “VLOG geprüft” mixture is to be documented with two mixing protocols according to Annex XXIX or an equivalent mixing protocol. This is to be countersigned by the facility operator and the client. Both will receive a copy.

Explanation: The documentation of the mixing sequence and the individual mixes may also consist of individual grinding and mixing protocols.

C 6.4  Sampling

Effective January 1, 2020, operators of mobile grinding and mixing facilities will be responsible for the sampling and testing specified in Chapter E 4.9 of the relevant feed mixes from grinding and mixing facilities (see Table 8 and Table 9). The number of required samples and tests will be revised until January 1, 2020.

C 6.4.1  Sampling Permission

The operator of mobile grinding and mixing facility must have written permission from each VLOG-certified agricultural business or agricultural VLOG group member. This authorises the operator of the mobile grinding and mixing facility to sample the manufactured “VLOG geprüft” feed mix.

C 6.4.2  Sampling Procedure

The business:

- is to carry out sampling of the “VLOG geprüft” mixtures according to best practices, including documentation. For this purpose, the business is to define, in coordination with VLOG, a sampling process that covers the following aspects:
  - type of samples, sampling locations, compilation of collective samples, designated sampler, creation of reference samples, sample size, and sampling frequency.
- must save the reference samples as agreed and/or make the samples available to VLOG.

C 6.5  Transportation of Feed or Trading of Feed

If the business performs activities in the area of transport, storage and handling as well as trade of feed that are subject to the certification obligation, the relevant requirements according to Chapter B 1 to B 5 must be complied with.

C 6.6  Identification in Bills of Lading

VLOG-certified mixtures must be labelled on all bills of lading using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2).
C 6.7  Specific Corrective Measures

If the agricultural client communicates positive GMO test results of “VLOG geprüft” mixtures and single-component feed therein that put in question the effectiveness of the measures taken by the facility operators to prevent GMO carryover, corrective measures must be introduced and documented in order to prevent recurrence.

The implementation and effectiveness of corrective actions is to be monitored and verified within an appropriate time period.
Part D Matrix Certification for the Logistics and Feed Manufacture Stages

D 1 Definition........................................................................................................................................... 48

D 2 Details of the Certification Procedure.................................................................................................. 48
  D 2.1 Conditions and Requirements for the Certification ............................................................................. 48
  D 2.2 Certification Procedure ....................................................................................................................... 49
    D 2.2.1 Application for Certification, Submission of the Matrix Description .............................................. 49
    D 2.2.2 Initial Certification Based on Initial Data Collection by the Matrix Organiser ............................... 49
    D 2.2.3 Initial Certification on the Basis of 100% Audits by the Certification Body ..................................... 50
    D 2.2.4 Effects of Audit Results on Labelling and Marketing ................................................................. 50
    D 2.2.5 Certificate Issuance ......................................................................................................................... 51
    D 2.2.6 Change/Update of the Site List ...................................................................................................... 51
    D 2.2.7 Distribution of the Audit Report ................................................................................................... 51

D 2.3 Follow-up Certification and Monitoring/Audit Intervals .................................................................... 51

D 2.4 KO Requirements .................................................................................................................................. 51

D 3 Requirements for Matrix Organisers ..................................................................................................... 52
  D 3.1 Matrix Description, Site List, Facility Description ............................................................................... 52
  D 3.2 Contractual Binding of the Members (KO) .......................................................................................... 53
  D 3.3 Risk Management (KO) ....................................................................................................................... 53
  D 3.4 Implementation of the Requirements for Sampling and Testing ....................................................... 53
  D 3.5 Staff and Member Training by the Matrix Organiser ......................................................................... 54
  D 3.6 Handling of Non-compliant Feed, Raw Materials and Products (KO) .............................................. 55
  D 3.7 Complaint Management ..................................................................................................................... 55
  D 3.8 Goods Recall ...................................................................................................................................... 55
  D 3.9 Crisis Management (KO) .................................................................................................................... 55
  D 3.10 Corrective Action/Continuous Improvement Process .................................................................... 56
  D 3.11 Documentation and Retention Periods ............................................................................................ 56
  D 3.12 Internal Audit .................................................................................................................................... 56
**D 1 Definition**

A matrix is defined as an association of different businesses/sites for the purpose of VLOG certification. The matrix is organised by a matrix organiser, while the participating businesses are referred to as matrix members, and their sites, as matrix sites. Matrix certification is available for businesses with at least two sites as well as for multiple businesses with their sites.

Matrix certification in the Logistics and Feed manufacturing Stage may be requested for the following five sub-stages:

- Transport of feed, raw materials and products
- Trade/drop shipping of feed, raw materials and products (incl. transferring feed to “VLOG geprüft” quality)
- Storage/handling of feed, raw materials and products
- Production/processing of feed
- Mobile grinding and mixing facilities

Several of these sub-stages may be combined in a single matrix certification.

Matrix members are subject to the corresponding requirements of Stage B and/or C. The specifications of this Chapter apply additionally.

**D 2 Details of the Certification Procedure**

**D 2.1 Conditions and Requirements for the Certification**

- Contract between the matrix organiser and a VLOG-recognised certification body
- Signed Standard Usage Agreement\(^8\) between the matrix organiser and VLOG

**Explanation:**

- A matrix member can only be a member in one VLOG matrix for a specified activity area (e.g. Transport). If a member performs various activities (e.g. transport and trading or feed manufacturing and transport), the business can be a member in multiple VLOG matrices for each activity area. If a business is a member of a VLOG matrix, an independent single certification according to the VLOG Standard is not permissible for the same activity area.

- The “ohne Gentechnik”/“VLOG geprüft” labelling of feed, raw materials and products at one site is only permissible if the site was reported to the certification body in accordance with the requirements of Chapter D 2.2.1, the matrix organiser has performed the initial collection of data and, if applicable, the certification body has performed an audit at the site, and the site has been approved by the certification body for the VLOG matrix.

- Only one certification body may be commissioned for the entire matrix certification. It is not permissible to retain multiple certification bodies for one matrix certification.

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\(^8\) Known as “Certification Agreement” until to 20 June 2017.
D 2.2 Certification Procedure

The matrix certification for logistics and feed manufacturing is to occur in the following steps: (see Chapters D 2.2.1 to D 2.2.7)

- Application for certification made to a VLOG-recognised certification body and submission of the matrix description (see Chapter D 3.1), including risk grading of the sites.
- If applicable, initial collection of data by the matrix organiser
- Audit planning by the certification body with the matrix organiser (scope, date/time, duration of audit)
- Audit performance at the matrix organiser and the matrix site according to Chapter A 3.7 by the auditor, incl. evaluation of requirements, review 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
  - including confirmation of the approved sites
- Certification of the VLOG matrix for logistics and feed manufacturing

The described procedure is also to be applied to new matrix sites.

D 2.2.1 Application for Certification, Submission of the Matrix Description

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

The matrix organiser determines the basis on which the VLOG initial certification and the future approval of additional sites will be carried out (see Annex IX):

- Initial data collection at matrix sites by the matrix organiser, together with audits by the certification body of the matrix organiser, at 100% of food manufacturers and 33% of logistics sites (see Chapter D 2.2.3)

or

- Audit of the matrix organiser and all matrix sites by the certification body (see Chapter D 2.2.3).

The selected procedure of initial certification applies to the approval of new sites in a VLOG matrix for Logistics and Feed manufacturing. The certification body then updates the member and site list (see Chapter D 3.1).

Explanation: If the certification body selects the process of 33% audits, each site must be audited by the matrix organiser prior to being accepted. Without an audit by the certification body, the logistics site can only be accepted if this 33% criterion is still met after its acceptance. If this is not the case, a corresponding number of sites/applicants must be audited by the certification body prior to acceptance to meet this value. Newly added sites for feed manufacturing always must be audited by the certification body prior to their acceptance.

D 2.2.2 Initial Certification Based on Initial Data Collection by the Matrix Organiser

The certification body must perform an initial audit of the matrix organiser.
**Explanation: This audit is generally done before the audits of the sites.**

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

The matrix organiser subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories for each site.

The certification body reviews and evaluates the matrix description and the site-related facility descriptions of all matrix sites and the matrix organiser. Information/documents that are missing or must be corrected are to be requested from the matrix organiser. Once all information/documents are available, the certification body will review the matrix organiser’s results of the initial data collection from 100% of feed manufacturers and at least 33% of logistic sites by comparing them to its own initial audits.

**Explanation: The certification body is responsible for ensuring a balanced distribution of the audits of the sites, considering the risk grading of the matrix organiser and e.g. size of the facility and organisation, geographic location, supplier, etc. If the certification body considers it necessary, it may also audit more than 33% of the sites.**

The certification body must compare the results of the initial data collections with its own results and will initiate whatever measures may be required.

The audit intervals for every individual site for the upcoming audit period are to be determined by the certification body. The certification body will also review the risk grading of the logistics sites.

**Explanation: The certification body has the right not to accept the data collected by the matrix organiser and to conduct an audit of all sites. The decision must be justified in a verifiable manner.**

**Explanation: Annex IX schematically shows the process of matrix certification.**

**D 2.2.3 Initial Certification on the Basis of 100% Audits by the Certification Body**

As an alternative to D 2.2.2, all audits are to be performed by the certification body (see Annex VIII):

The certification body must perform an initial audit of the matrix organiser.

**Explanation: This audit is generally done before the audits of the sites.**

The matrix organiser is to transmit the site-related facility descriptions of the sites to the certification body. The certification body performs VLOG audits in accordance with Chapter A 3.7 at the sites. Risk grading and the certification decision are to be reviewed based on the VLOG audit.

**D 2.2.4 Effects of Audit Results on Labelling and Marketing**

- If, due to the audit results, the certification of the VLOG matrix is suspended or revoked, the labelling of products with “ohne Gentechnik”/“VLOG geprüft“ is not permitted for any members of the VLOG matrix.

- The matrix may continue to market raw materials and products labelled “ohne Gentechnik” and feed labelled “VLOG geprüft” even if individual sites were excluded from the matrix. In this case,
the marketing of raw materials and products labelled “ohne Gentechnik”/feed labelled “VLOG geprüft” will be prohibited only for the excluded former sites.

**D 2.2.5 Certificate Issuance**

The VLOG certificate will be issued for the VLOG matrix logistics and/or feed manufacturing and must contain the company name of the matrix organiser. The matrix organiser will also receive the list of sites from the certification body. For matrix certifications in logistics and feed manufacturing, the site list must contain the following for each matrix site:

- The defined risk category
- The last routine audit date

*The certification body may issue the matrix member a confirmation of membership in a VLOG matrix for the sites that are involved in the certification. The confirmation shall indicate the sub-stage of the site.*

**D 2.2.6 Change/Update of the Site List**

The matrix organiser must report changes and/or updates to the site list to the certification body without delay.

*Explanation: The site list represents an overview of the businesses/sites approved by the certification body for the VLOG matrix logistics and feed manufacturing.*

**D 2.2.7 Distribution of the Audit Report**

For each audit, the matrix organiser and/or the audited site are to receive an audit report from the certification body including any deviations found and measures to be implemented.

*Explanation: The audit report of the site is to be distributed to the sites via the matrix organiser or sent to them directly, depending on what was agreed beforehand.*

**D 2.3 Follow-up Certification and Monitoring/Audit Intervals**

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective measures at the sites.

In the case of logistics and feed manufacturing matrix certifications, the certification body is to perform an audit of the matrix organiser every year; for the matrix sites, audits at the intervals specified below. The audit interval commences as of the date the certificate is first issued.

Audit intervals of different sites:

- Feed manufacturing sites must be audited annually by the certification body
- All matrix sites of the logistics and mobile grinding and mixing facilities stage must be audited by the certification body within 3 years.

**D 2.4 KO Requirements**

The following KO requirements have been determined:

- Contractually binding of the members (D 3.2)
• Risk management (D 3.3)
• Handling of non-compliant feed, raw materials and products (D 3.6)
• Crisis management (D 3.9)

D 3   Requirements for Matrix Organisers

D 3.1   Matrix Description, Site List, Facility Description

Matrix description

The matrix organiser must submit a current matrix description to the certification body when applying for VLOG certification. The matrix organiser must promptly notify the certification body of major changes pertaining to the matrix description pertaining to the VLOG certification.

The matrix description must contain/provide at least:

• A list of the matrix sites and a full description of their activities
• A list and description of the activities of the subcontractors/contract processors/outsourced processes, which are integrated into the VLOG matrix, including the persons in charge and their contact data
• A list of all areas for which the group organiser is responsible (e.g. risk management, sampling, testing etc.)
• The persons in charge of matrix certification for the matrix organiser, including their contact information
• The basis used for the VLOG initial certification and the approval of additional sites in the future (100% or 33% initial audits by the certification body)

Site list

The complete list of matrix sites and matrix members for matrix certification is to be on file and up to date. At a minimum, it must contain the following information:

• Address/clear identification of the site, official authorisation number, contact person and its contact information, name of business associated with the site.
• The defined risk category
• The last routine audit date
• Activity area (stage/sub-stage)

The matrix organiser will promptly notify the certification body of any changes to the site list.

Explanation: At the request of VLOG, the matrix organiser must promptly send the current list of sites to VLOG.

Facility description of sites

The matrix organiser is responsible for the facility descriptions of the sites and for keeping them up to date. There is one facility description for each site. The matrix organiser will notify the certification body
promptly of any internal changes pertaining to certification. The certification body decides whether additional audits must be performed outside the regular intervals.

Explanation: Major changes pertaining to the VLOG certification include, e.g., changes to products and/or processes.

D 3.2 Contractual Binding of the Members (KO)

The matrix members/sites are to be contractually bound to the matrix organiser. The agreement must cover compliance with the VLOG Standard at the corresponding stage as well as specifications and duties under the individual risk management of the matrix. By signing the agreement, members undertake to implement any corrective actions and deadlines as instructed by the matrix organiser. The member must sign the declaration of participation/agreement.

D 3.3 Risk Management (KO)

Risk analysis

There is a documented risk analysis for all relevant feed, raw materials, products, procedures and processes, including risk assessment for “ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis includes at least:

- Feed, raw materials and products for the “ohne Gentechnik”/“VLOG”/“VLOG geprüft” area
- Handling of feed, raw materials and products that meet the requirement for “ohne Gentechnik”/“VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “ohne Gentechnik”/“VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous freight in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions must be introduced and implemented for the identified risks based on the risk analysis.

There must be an annual review of the risk management, including a review of the matrix description, e.g. as part of an internal audit.

D 3.4 Implementation of the Requirements for Sampling and Testing

Sampling and test plan

The matrix organiser must submit a written sampling and testing plan for the matrix sites, which defines the risk-based sampling and GMO testing for risk-prone feed, raw materials and products of relevance for “ohne Gentechnik”/“VLOG geprüft” processes in the business. The sampling and testing scopes can be found in the corresponding chapters of Parts B and C. The matrix organiser must ensure compliance with
the sampling and testing plan. The various productions/processing technologies of the sites are to be taken into account when generating the sampling and testing plan.

The sampling and test plan, in compliance with the requirements listed in Part J, must at a minimum contains/defines the following:

- A written, documented risk analysis of the utilised/handled at-risk feed, raw materials and products, and the associated definition of the risk-prone feed, raw materials and products to be sampled/tested
- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and time intervals of sampling and GMO testing
- Determination of the parameters to be tested for (see Annex IV)
- Description of the testing procedure (commissioned laboratory, scope of testing).

The sampling and test plan is to be implemented according to schedule.

**Evaluation of the analytical data**

The matrix organiser:

- collects the test results of the matrix sites, and evaluates these at least once per year. These evaluations must be conducted for each site
- performs a site evaluation based on the evaluation results
- defines risk-based measures for the sites as applicable

**Handling of positive test results**

In case of positive GMO test results, the matrix organiser must initiate (corrective) measures according to Annex V (for feed) and Annex VI (for food) as well as the provisions of Chapters B 5.2.3 or C 4.2.2.

*Explanation:* If collective samples from various batches/feed deliveries are tested, their results cannot be applied as single-operation test results.

*Sampling and GMO testing is not required if the utilised risk-prone feed, raw materials and products cannot be tested for genetic engineering for technical reasons.*

**D 3.5   Staff and Member Training by the Matrix Organiser**

All staff members of the matrix organiser involved in the operating procedures of relevance to “ohne Gentechnik”/“VLOG geprüft” certification must be trained concerning the “ohne Gentechnik” requirements and the operating procedures laid down for this purpose. Training is to take place before they begin with their activity, as well as on an ongoing basis, and at least once a year. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

The matrix organiser must communicate all relevant requirements and information on “ohne Gentechnik”/“VLOG geprüft” production to the members. Communication of the information is to be documented.
D 3.6 Handling of Non-compliant Feed, Raw Materials and Products (KO)

The matrix organiser has to have an effective and documented procedure for handling non-compliant feed, raw materials and products in place. This includes at a minimum the following steps:

- Labelling of affected feed, raw materials and products
- Notification of customers/buyers, suppliers and matrix members
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

Explanation: Employees of the matrix organiser involved in relevant operating processes for “ohne Gentechnik”/“VLOG geprüft” include, for example, QM, Procurement etc.

D 3.7 Complaint Management

A documented system must be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be coordinated with the affected members and initiated for justified complaints and feedback.

D 3.8 Goods Recall

An effective and documented procedure for the goods recall, including determination of responsibilities, is to be in place for non-compliant feed, raw materials and products according to the VLOG Standard. This must include the immediate written notification of customers/ordering parties.

D 3.9 Crisis Management (KO)

The matrix organiser is responsible for the crisis management of the entire VLOG matrix.

An up-to-date and documented procedure for managing possible crisis situations that may impact product quality and the legitimacy of “ohne Gentechnik” raw materials/products or “VLOG geprüft” feed must be in place. This procedure must at a minimum include:

- The steps to follow in the event of a crisis
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency numbers

Explanation: Non-compliant feed, raw materials and products must be identifiable, e.g. based on positive test results.
• Regulation for the immediate notification of the VLOG Head Office, the certifier and any affected business partners and customers
• Legal advisement (if required)

The crisis management procedure is to be periodically tested internally at least once a year with regard to practicality, functionality and immediate implementation, with results documented.

D 3.10 Corrective Action/Continuous Improvement Process

If internal audits, external audits, or complaints management result in the identification of deviations from Standard requirements, the matrix organiser, if applicable together with the members, is to take and document corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions must be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.

D 3.11 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not possible. All documents relating to the matrix certification and the “VLOG geprüft”/”ohne Gentechnik” labelling are to be retained for the following period, unless statutory provisions require a longer retention period: at least five years.

Explanation: Documents that must be retained are e.g. delivery slips, supplier evaluations, training documents, etc.

D 3.12 Internal Audit

The matrix organiser must perform annual internal audits, which at a minimum cover the general and business-specific Standard requirements of the matrix certification stage. The matrix organiser is subject to annual audits, which at a minimum cover the general and business-specific Standard requirements of the matrix certification stage.

The internal auditors must have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.
Part E: Agriculture

E 1  Stage Definition and Mandatory Certification ................................................................. 59
E 2  Details of the Certification Procedure .................................................................................. 62
   E 2.1  Risk Grading .................................................................................................................... 62
   E 2.2  Audit Frequency ............................................................................................................... 65
   E 2.3  KO Requirements ........................................................................................................... 65
E 3  General Requirements ........................................................................................................... 65
   E 3.1  Facility Description .......................................................................................................... 65
   E 3.2  Assignment of Responsibilities/Organisational Chart ...................................................... 65
   E 3.3  Risk Management ............................................................................................................ 66
   E 3.4  Joint Use of Machines, Facilities/External Service Providers ........................................... 66
   E 3.5  Handling of Non-compliant Feed, Products and Animals (KO) ........................................... 67
   E 3.6  Traceability (KO) ............................................................................................................ 68
   E 3.7  Complaint Management .................................................................................................. 68
   E 3.8  Goods Recall .................................................................................................................... 68
   E 3.9  Crisis Management (KO) ............................................................................................... 68
   E 3.10 Corrective Action ............................................................................................................ 69
   E 3.11 Documentation and Retention Period ............................................................................ 69
   E 3.12 Staff Training .................................................................................................................. 69
   E 3.13 Self-monitoring ............................................................................................................. 69
E 4  Specific Requirements for Animal-based Production .............................................................. 70
   E 4.1  Animal Inventory .............................................................................................................. 70
   E 4.2  Feed Ordering .................................................................................................................. 70
   E 4.3  Feed List .......................................................................................................................... 70
   E 4.4  Feed Rations ................................................................................................................... 71
   E 4.5  Incoming Goods Inspection of Feed (KO) ....................................................................... 71
   E 4.6  Compliance with the Minimum Feeding Conversion Period (KO) .................................... 71
   E 4.7  Segregation of Goods Flows/Exclusion of Carryover from GMO Feed, Commingling and Swapping (KO) ........................................................................................................ 73
   E 4.8  Use of Grinding and Mixing Facilities ............................................................................. 74
       E 4.8.1 Joint Use of Grinding and Mixing Facilities ............................................................... 74
E 4.8.1.1 Documentation of Feed Mixture

E 4.8.1.2 Specific Measures to Eliminate Carryover of GMO Feed

E 4.8.2 Use of Stationary Grinding and Mixing Facilities

E 4.8.2.1 Use of Grinding and Mixing Facilities Exclusively for Feed Not Subject to Compulsory Labelling

E 4.8.2.2 Dual Use of Grinding and Mixing Facilities for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling

E 4.8.2.3 Documentation of Feed Mixture

E 4.8.2.4 Specific Measures to Eliminate Carryover of GMO Feed

E 4.9 Sampling and Testing

E 4.9.1.1 Risk-prone Feed

E 4.9.1.2 Sampling and Test Plan

E 4.9.1.3 Sampling and Testing frequency, Retention of Reference Samples

E 4.9.1.4 Reduction of the Scope of Testing after Changing Feed in Group Organisations

E 4.9.1.5 Handling of Positive Test Results

E 4.10 Inspection of Outgoing Goods/Labelling on Bills of Lading

E 5 Specific Requirements for Plant-based Feed Production

E 5.1 Incoming Goods Inspection (KO)

E 5.2 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

E 6 Specific Requirements for Animal Transport/Livestock Trade

E 6.1 Incoming Goods Inspection (KO)

E 6.2 Risk Management

E 6.3 Commissioning External Service Providers

E 6.3.1 Animal Inventory

E 6.3.2 “ohne Gentechnik” Compliant Feeding

E 6.4 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

E 6.5 Inspection of Outgoing Goods/Labelling on Bills of Lading
In the following part, the specific rules and requirements for the Agriculture Stage and its sub-stages are described.

### E 1 Stage Definition and Mandatory Certification

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.

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification possible, despite absence of mandatory certification</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
</table>
| 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  
If an agricultural operation falls under one of the above-mentioned points, a document check is necessary. Please contact the VLOG Head Office in this regard. | Yes | E 1-E 4, if applicable J 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). | | Yes | E 1-E 4, if applicable J 3 |
### Sub-stage

<table>
<thead>
<tr>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification possible, despite absence of mandatory certification</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>For pullet producers 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.</td>
<td>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).</td>
<td>Yes</td>
<td>E 1-E 4, if applicable J 3</td>
</tr>
</tbody>
</table>

### Plant-based production: The cultivation of primary products, including harvesting and foraging.

<table>
<thead>
<tr>
<th>Cultivation of feed</th>
<th>For the cultivation of feed used within the operation for the production of food of animal origin with the “ohne Gentechnik” label.</th>
<th>For the cultivation of feed not used within the operation for the production of food of animal origin with the “ohne Gentechnik” label.</th>
<th>Yes</th>
<th>E 1-E 3, E 5, J 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultivation of food/raw materials</td>
<td>For the production of plant-based raw materials/food.</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Animal transport/livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transferring and resting, until the completion of unloading of the animals at the intended destination.

<p>| Livestock trade (applies for trading VLOG animals) | Applies to animal transport, provided that all of the following three conditions are met: | Yes | E 1-E 3, E 6 |</p>
<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification possible, despite absence of mandatory certification</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Commissioning by a VLOG-certified business.</td>
<td>• Transport is integrated into the risk management of the VLOG-certified business.</td>
<td>For animals which have not yet begun the minimum feeding conversion period.</td>
<td>For animals which have not yet begun the minimum feeding conversion period.</td>
</tr>
</tbody>
</table>
E 2  Details of the Certification Procedure

E 2.1  Risk Grading

Risk grading by the auditor (see Chapter A 3.10) will 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.

<table>
<thead>
<tr>
<th>Grading criterion</th>
<th>Risk Category 0</th>
<th>Risk Category 1</th>
<th>Risk Category 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>GMO feed within the business</td>
<td>Only possible if all of the following criteria are met:</td>
<td>Feed subject to compulsory labelling, which can be swapped, is present at the site.</td>
<td>Following initial conversion to “ohne Gentechnik” production (or conversion to “ohne Gentechnik” production, possibly with a time lag), 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 is present at the site.</td>
</tr>
<tr>
<td></td>
<td>• No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site.</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

This also includes the internal or external dual use of mixer vehicles for “ohne Gentechnik” production.
<table>
<thead>
<tr>
<th>Grading criterion</th>
<th>Risk Category 0</th>
<th>Risk Category 1</th>
<th>Risk Category 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG stall</td>
<td>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.</td>
<td>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).</td>
<td></td>
</tr>
<tr>
<td>Certification status of risk-prone feed not subject to compulsory labelling used in “ohne Gentechnik” production (which do not fall under the exceptions in Chapter E 4.9.1.1)</td>
<td>Potentially risk-prone feed and feed suppliers (excluding see Chapters B 1, C1) must be certified pursuant to the VLOG Standard or a standard recognised as equivalent.</td>
<td>Potentially risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used. Potentially risk-prone feed is being used that has been certified pursuant to the VLOG Standard but lost the certification status due to a violation of the certification obligations in the supply chain (see B1, C1).</td>
<td></td>
</tr>
<tr>
<td>Use of: • mobile grinding and mixing systems used by several businesses or • stationary grinding and/or mixing facilities of agricultural self-mixers</td>
<td>Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.</td>
<td>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: 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 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT).</td>
<td></td>
</tr>
<tr>
<td>Grading criterion</td>
<td>Risk Category 0</td>
<td>Risk Category 1</td>
<td>Risk Category 2</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------------</td>
<td>-----------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>• The facility used is certified according to a recognised quality assurance system (e.g. QS, KAT).</td>
<td>• Measures to prevent carryover of GMO are described in the QM manual of the facility operator.</td>
<td>System purges and/or removal of residues are carried out to prevent GMO carryover.</td>
<td></td>
</tr>
<tr>
<td>• System purges and/or removal of residues are carried out to prevent GMO carryover.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
E 2.2 Audit Frequency

Annual routine audits are carried out for individual certification of agricultural operations. In the case of agricultural group certifications, audits are performed in accordance with Chapter F 2.3.

E 2.3 KO Requirements

The following KO requirements have been determined:

- Handling of non-compliant feed, products and animals (E 3.5)
- Traceability (E 3.6)
- Crisis Management (E 3.9)
- Incoming Goods Inspection (E 4.5, E 5.1, E 6.1)
- Compliance with the Minimum Conversion Feeding Period (E 4.6)
- Segregation of Goods Flows/Exclusion of Carryover from GMO Feed, Commingling and Swapping (E 4.7, E 5.2, E 6.4)

E 3 General Requirements

E 3.1 Facility Description

The facility description in accordance with Annex XX or XXI must be available and up to date.

Explanation: 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.

E 3.2 Assignment of Responsibilities/Organisational Chart

There must be an up-to-date organisational chart that:

- describes the organisational structure and
- lists responsibilities and substitution rules.

Explanation: 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.
E 3.3  Risk Management

Explanation: In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with “ohne Gentechnik” it is only permissible to use feed not subject to compulsory labelling.

Risk analysis

A documented risk analysis must be in place for all relevant facility-specific procedures and processes including assessment of the risks for “ohne Gentechnik” labelling.

The risk analysis must at a minimum cover the following points:

- 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)
- Multi-operation uses of machines, facilities/external service providers (see Chapter E 3.4)

Explanation: If the facility description addresses all points of the risk analysis, a separate risk analysis document will not be required.

Risk management

Detailed measures tailored to the business in question must be determined 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.

The individual operative and risk-based procedural steps must be

- documented for each operation with separate proof of adequate spatial and temporal separation or logistical measures
- implemented accordingly and
- reviewed for efficacy as part of the self-monitoring process.

In any case, appropriate measures are required at the beginning of the feeding conversion to avoid carryover and commingling with GMOs, including all equipment, storage areas, facilities, mixing facilities, transportation means, etc. that come into contact with the feed.

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 significantly elevated risk of carryover through residual feed, shared use of equipment, dust, etc.

If the facility description covers all individual and risk-based procedural steps, a separate document will not be required.

E 3.4  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 risk management (E 3.3) of the business, and corresponding process steps and measures to prevent GMO carryover are to be established. If measures are necessary to ensure compliance with the requirements of the VLOG Standard in case of shared machine use or subcontracted businesses, a separate compliance agreement must be signed with these businesses.

**E 3.5 Handling of Non-compliant Feed, Products and Animals (KO)**

An effective and documented procedure must be in place for handling non-compliant feed, products and animals or positive test results or other findings regarding non-compliance with “ohne Gentechnik” requirements.

At a minimum, it must include the following points:

- labelling of the affected feed, products and animals
- notification of customers/buyers and suppliers
- error management
- initiation, monitoring, evaluation and documentation of corrective actions
- blocking and release of feed, products and animals
- documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

Positive feed test results are to be treated according to Annex V.

For positive test results of unlabelled feed that is, however, clearly subject to compulsory labelling (e.g. milk with “ohne Gentechnik” production), the residual contaminated feed must be replaced or used outside the area dedicated to “ohne Gentechnik” production once the erroneous labelling becomes known.

If a serious infraction of non-GMO feeding invalidating “ohne Gentechnik” labelling occurred through faulty labelling of feed, the minimum feeding conversion period for the animals concerned must start anew, if applicable, shortened according to specific circumstances.

**Explanation:** Food which has already been marketed (e.g. milk with “ohne Gentechnik” labelling) needs not be recalled.

**Explanation:** 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

**Explanation:** A legal opinion of the law firm [GGSC] 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 November 2015 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/).
E 3.6 **Traceability (KO)**

The introduced/installed traceability system must guarantee that:

- All feed and “ohne Gentechnik” products and animals present at the facility that are associated with the “ohne Gentechnik” label can be clearly identified at all times.

- The goods flow of “ohne Gentechnik” products and animals as well as quantity lists and evaluations can be generated within one working day to allow for conclusions about goods flows and their plausibility.

*Explanation: For this purpose, the following data is to be determined, among others:*
  - Information on supplier and delivery date
  - Quantity
  - Information on delivery date and supplied customers and business partners

E 3.7 **Complaint Management**

**Individual certification**

A documented system must be introduced to handle complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) must be initiated for justified complaints and feedback.

**Group certification**

Agricultural operations that are included in the group certification must inform the group organiser in the event of complaints and claims and coordinate corrective measures with the group organiser.

*Explanation: A complaint management protocol is required only for agricultural operations not included in the group certification.*

E 3.8 **Goods Recall**

An effective and documented procedure must be in place for the goods recall of non-compliant products or animals according to the VLOG Standard, including the definition of responsibilities.

E 3.9 **Crisis Management (KO)**

In the event of a crisis, the agricultural operation must notify the competent certification body and, in the case of group certification, also the group organiser. Further measures will be agreed upon with the group organiser.

An up-to-date and documented procedure for managing possible crisis situations that may impact product quality and the legitimacy of “VLOG geprüft” feed and “ohne Gentechnik” raw materials/products must be in place. This procedure including the contingency plan must be implemented and must comprise at least:

- steps to follow in the event of a crisis
- assigned responsibilities including substitute rules
• availability (within and outside of business hours)
• list of emergency phone numbers
• regulations for the immediate notification of the VLOG Head Office, the certifier and any affected business partners and customers

Explanation: A crisis can occur, for example, if genetically modified feed or feed with GMO commingling > 0.9% was fed.

A crisis management protocol is required only for agricultural operations not included in the group certification. In this case, the group organiser would take over crisis management (see Chapter F 3.10)

E 3.10 Corrective Action

If deviations from Standard requirements are detected within the scope of an internal audit, external audits or complaint management, the business must take and document corrective actions. The timely implementation of corrective actions must be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.

E 3.11 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not possible.

All documents relating to “ohne Gentechnik” production are to be retained for the following period, unless statutory provisions require a longer retention period: at least five years.

Documents that must be retained include bills of lading, invoices for operating materials (e.g. seeds), feed accompanying documents, training documentation, orders, declarations, etc.

E 3.12 Staff Training

All staff involved in the operating procedure of the “ohne Gentechnik” sector shall be trained concerning the “ohne Gentechnik” requirements and the operating procedures laid down therein. Training shall take place before they take up their activity as well as on a continuous basis at least once a year.

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

Explanation: For small agricultural operations, there is no need for separate “ohne Gentechnik” training for employees.

Training may take place in the form of practical instructions. 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 “ohne Gentechnik” operating procedure.

E 3.13 Self-monitoring

An internal self-monitoring is to be performed once per year. During this monitoring, the facility description will be checked and updated as appropriate. The monitoring and results must be documented.
E 4  Specific Requirements for Animal-based Production

E 4.1  Animal Inventory

All animal species or animal categories kept in the business for food production are recorded in a current livestock overview. This must include whether these animals are fed in accordance with the "ohne Gentechnik" Standard or not.

E 4.2  Feed Ordering

Feed that is not VLOG-certified for “ohne Gentechnik” production must be ordered in writing, stating the following aspects:

- Animal species/Animal category
- Feed type/designation
- Reference to feed quality not subject to compulsory labelling or use for the production of food labelled as “ohne Gentechnik”/“VLOG”

As an alternative to ordering feed in writing, for feed relevant for “ohne Gentechnik” production there must be:

- a written agreement with the supplier that the feed supplied is suitable for production of “ohne Gentechnik”/“VLOG” labelled food and not subject to compulsory labelling

Explanation: The agreement must comprise at least the names and addresses of the businesses involved and the name of the feed(s) included in the agreement.

- Or additional information of the feed supplier on the bill of lading/delivery slip with the following wording:
  “The following feed 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: ...”

VLOG-certified 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.

E 4.3  Feed List

An up-to-date feed list must be available, in which all feeds used in the business, their origin as well as their intended use (animal species/animal category) are indicated

Explanation: The feed list serves as an aid for ensuring “ohne Gentechnik” feeding:

- The list may serve as a basis to verify and ensure that appropriate certificates are at hand for every delivery of feed, certifying 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. These are to be labelled “interchangeable”.

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 shall also be entered in the feed list.

An alternative for small businesses is a feed list realised by chronologically filing invoices and bills of lading.

E 4.4 Feed Rations

Current feed rations for all animal species and animal categories of “ohne Gentechnik” production must be documented, taking into account differences in life phases or season.

**Explanation:** In accordance with EGGenTDurchfG and the VLOG Standard, for the production of food products or food ingredients of animal origin labelled with “ohne Gentechnik”/”VLOG” it is only permissible to use feed not subject to compulsory labelling.

E 4.5 Incoming Goods Inspection of Feed (KO)

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for “ohne Gentechnik” production.

**Explanation:** This is, first and foremost, the examination of the waiver of labelling in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003 on feed labels or bills of lading.

**Incoming goods inspection of bulk VLOG-certified feed:**

- When bulk animal feed is received, the accompanying bills of lading must be checked for the “VLOG geprüft” seal. A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once annually.

**On receipt of sacked VLOG-certified feed:**

- All bags must be checked for the “VLOG geprüft” seal.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once annually.

All bills of lading for purchased feed must be reviewed for completeness of the information provided and filed in chronological order.

E 4.6 Compliance with the Minimum Feeding Conversion Period (KO)

Before food from animal sources (meat, milk, eggs) can be labelled “ohne Gentechnik,” an exclusive “ohne Gentechnik” feeding regimen must be followed for the minimum feeding conversion period defined for each animal species and intended use according to Table 7. The process for complying with the minimum feeding conversion period must be described.
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 | ten weeks
Poultry for egg production | six weeks
Other animal species/categories | from the time of birth/hatching

Table 7: Minimum feeding conversion period according to EGGenTDurchfG (see EGGenTDurchfG, most recently amended by Art. 58 V of 31 August 2015 | 1474)

Ensuring the aforementioned minimum feeding conversion periods within the business is to be verified by means of the feed list (see Chapter E 4.3) and feed bills of lading/cultivation records.

If an animal was fed with feed subject to compulsory labelling during or after the minimum conversion period, the minimum conversion period must start anew for this animal.

**Purchasing animals:**

The “ohne Gentechnik”-compliant feeding period of the previous owner may be counted towards the minimum feeding conversion period only if a written confirmation by the previous owner is available in accordance with Annex II. VLOG-certified farms are not required to obtain the confirmation set out in Annex II. In this case the confirmation must at least contain the date from which the animals were verifiably consistently fed with feed not subject to compulsory labelling up until the date of the sale.

**Egg-producing operations:**

The “ohne Gentechnik” compliant feeding of pullets by pullet producers may only be considered if they are VLOG-certified for pullet rearing or a group member of a VLOG group.

- The VLOG certification of the pullet producer is to be checked periodically, the minimum being once annually.

If the pullet producer is not VLOG-certified, the minimum feeding conversion period according to E 4.6 must be complied with in a VLOG egg-producing operation before the eggs may be labelled “ohne Gentechnik”.

---

10 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.
**E 4.7 Segregation of Goods Flows/Exclusion of Carryover from GMO Feed, Commingling and Swapping (KO)**

**Feed of different qualities:**

If feed subject to labelling is (temporarily) available in the business, the following requirements must be met:

The business does not carry out any conventional production of the same animal category with feed subject to labelling parallel to “ohne Gentechnik” production.

Permissible exception:

- The different productions take place in completely different operating facilities, which also involves completely separate storage and handling of feed.

*Explanation: 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.*

- The facility’s individual measures specified in Chapter E 3.3 must ensure 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.
  
  - The flows of goods are segregated spatially and/or temporally.
  
  - 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. Before beginning the “ohne Gentechnik” feeding – especially in case of frequent switching between “ohne Gentechnik” feed and feed subject to compulsory labelling – the measures determined according to Chapter E 3.3 are to be carried out and documented. It must also be documented where any residual quantities of feed that requires labelling were moved to.

*Explanation: Vehicles, for example, must be verifiably dry cleaned after having transported bulk feed subject to compulsory labelling.*

- 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.

If interchangeable feed subject to compulsory labelling is available, the following additional requirements must be complied with:

- Feed subject to compulsory labelling which can be swapped must be labelled with the intended use (animal category to which the feed is intended to be fed).

- In an operating unit there is no parallel use of feed not subject to compulsory labelling for “ohne Gentechnik” production and swappable feed that is subject to such labelling 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).

If feed mixer vehicles are used internally or externally for both feed subject to compulsory labelling and feed not subject to compulsory labelling, appropriate measures for avoiding carryover/commingling must be taken. At least one sufficient system purge or wet cleaning must be carried out between feed subject
to compulsory labelling and feed for “ohne Gentechnik” production. The system purge is to be used outside of “ohne Gentechnik” production.

**Products of different qualities:**
If the business simultaneously handles “ohne Gentechnik” products it produces itself and products 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. Furthermore, responsible 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.

### E 4.8 Use of Grinding and Mixing Facilities

#### E 4.8.1 Joint Use of Grinding and Mixing Facilities

##### E 4.8.1.1 Documentation of Feed Mixture

For each grinding and mixing process for the “ohne Gentechnik” production a grinding and mixing protocol according to Annex XXIX or an equivalent mixing protocol is to be prepared that is completely filled out and signed by the client and the facility operator.

##### E 4.8.1.2 Specific Measures to Eliminate Carryover of GMO Feed

The business must define measures in accordance with Chapter E 3.3 to prevent the carryover of GMO feed through the use of mobile grinding and mixing facilities. These measures are to be implemented, documented and checked for effectiveness within the scope of self-monitoring. If system purges from the mobile grinding and mixing facility remain, it is to be ensured that they are not used for “ohne Gentechnik” production.

For mobile grinding and mixing facilities that are not certified according to the VLOG Standard or a standard recognised as its equivalent, there is to be a written agreement with the facility operator containing at least the following:

- The facility operator’s commitment to scheduled maintenance and cleaning of the respective facility as well as its use according to the operating manual
- Before implementing the “ohne Gentechnik” production, complete draining and/or purging must be carried out to ensure that feed from the facility is not subject to compulsory labelling (derivation of the measures must be proven, e.g. by means of facility reports/confirmation of the facility manufacturer)
- When purchasing oils/fats from facility operators: commitment to use oils/fats not subject to compulsory labelling for “ohne Gentechnik” production
- Commitment to document the grinding and mixing processes carried out based on the grinding and mixing protocol according to Annex XXIX or an equivalent mixing protocol.

#### E 4.8.2 Use of Stationary Grinding and Mixing Facilities

##### E 4.8.2.1 Use of Grinding and Mixing Facilities Exclusively for Feed Not Subject to Compulsory Labelling

The exclusive use of feed not subject to compulsory labelling/“VLOG geprüft” feed must be documented in the facility description.
Explanation: If a grinding and mixing facility is used exclusively for feed not subject to compulsory labelling/"VLOG geprüft" feed, there are no further requirements.

E 4.8.2.2 Dual Use of Grinding and Mixing Facilities for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling

If the grinding and mixing facility is used for both feeds not subject to compulsory labelling/"VLOG geprüft" feed and feed subject to compulsory labelling, the conditions specified in the following chapters must be met.

E 4.8.2.3 Documentation of Feed Mixture

The sequence of the mixtures and the individual mixtures are documented daily for each facility. From the documentation it is must be evident which mixtures are those with feed that is subject to compulsory labelling and which ones are “VLOG geprüft” mixtures.

After finishing the mixture, each “VLOG geprüft” mixture is to be documented with a mixing protocol according to Annex XXIX or an equivalent mixing protocol. This is to be countersigned by the person conducting the mixture.

E 4.8.2.4 Specific Measures to Eliminate Carryover of GMO Feed

Individual measures/requirements including a cleaning plan are to be derived, documented and implemented according to Chapter C 3.6 for each facility to prevent the carryover of GMO feed from previous mixtures during the production of mixtures for the “ohne Gentechnik” production. Other risk factors such as the age of the facilities and repairs will be taken into account. Removal of residues and purging are to be documented in the mixing protocol according to Annex XXIX.

The proper operation of facilities is ensured. Each facility is

- cleaned pursuant to the business’s cleaning plan.

Maintenance and cleaning are to be documented.
E 4.9 Sampling and Testing

In the business, risk-based sampling and GMO testing of risk-prone feed relevant for “ohne Gentechnik” production is to be carried out in accordance to the following principles:

E 4.9.1.1 Risk-prone Feed

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

- Single-component feed from plant species such as soy, rapeseed/canola, maize/corn\(^{11}\), sugar beet\(^{12}\), 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 feed was neither processed by third parties nor transported by a commercial shipper.

- 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 equivalent standard

E 4.9.1.2 Sampling and Test Plan

In individually certified businesses, a written sampling and test plan must be available that describes the risk-based sampling and GMO testing of risk-prone feeds relevant for “ohne Gentechnik” production in the business.

In compliance with Part J, the sampling and test plan must at least contain/define the following:

- A written documented risk analysis of the risk-prone feed used and, based on this, the determination of the risk-prone feed to be sampled/tested.
- Description of the sampling procedure (type of samples, sample locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and time intervals of sampling and GMO testing
- Determination of the parameters to be tested for (see Annex IV)
- Description of the testing procedure (commissioned laboratory, scope of testing)

The sampling and test plan is to be implemented according to schedule.

\(^{11}\) Dried maize/corn grains that can be proven to have been cultivated demonstrably in Denmark, Germany, France, Greece, Italy, Croatia, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Northern Ireland, Austria, Poland, Scotland, Switzerland, Slovenia, Hungary, Wales, Wallonia (Belgium) or Cyprus can be classified as feed that is not risk-prone. This presumes the farmer obtains the maize/corn directly from the drying facility and a meaningful confirmation that only goods not subject to compulsory labelling were dried at the facility, including maize/corn produced in only these countries, is provided.

\(^{12}\) Feed produced from sugar beet (e.g. sugar beet chips, pellets, molasses) which can be proven to have been cultivated and, if applicable, processed in the EU or Switzerland are not graded as risk-prone feed if the farmer has conclusive confirmation from the manufacturer for each shipment confirming that the goods are feed produced from sugar beet that was cultivated and processed in the EU or Switzerland. This exception applies only for feed in which sugar beet is the only risk-prone feed component.
**Explanation:** Sampling and GMO testing are not necessary if the risk-prone feed cannot be analysed for genetic engineering for technical reasons.


**E 4.9.1.3 Sampling and Testing frequency, Retention of Reference Samples:**

**Sampling frequency:**

Sampling must take place in the following cases:

- At every delivery of risk-prone single-component and compound feed
- When using a mobile grinding and mixing facility in accordance with the guidelines in Table 8 and Table 9
- After every change from “ohne Gentechnik” feeding if the VLOG business facility/VLOG barn regularly switches between “ohne Gentechnik” feed and feed subject to compulsory labelling. The corresponding sample must be taken before or at the beginning of the minimum feeding conversion period and at the location where the feed is provided.

**Explanation:** Sampling of sacked goods (including tamper-resistant and sealed Big Bags) on delivery may be dispensed with.

As of 1 January 2020, the mobile grinding and mixing facility operator is responsible for the sampling and testing of the relevant feed mixtures from the grinding and mixing facility as required in Table 8 and Table 9. The number of required samples and tests will be revised until 1 January 2020.

**Mobile and dual stationary grinding and mixing facilities**

The sampling frequency listed in Table 8 is to be implemented yearly.

<table>
<thead>
<tr>
<th>Sample material</th>
<th>Yearly Minimum Sampling Frequency When Using Mobile Grinding &amp; Mixing Facilities for “ohne Gentechnik” Production</th>
</tr>
</thead>
<tbody>
<tr>
<td>VLOG certification of the mobile grinding and mixing facility</td>
<td>Feed for “ohne Gentechnik” production produced by the mobile grinding and mixing facility</td>
</tr>
<tr>
<td>The mobile grinding and mixing facility is VLOG* certified</td>
<td>4/year</td>
</tr>
<tr>
<td>The mobile grinding and mixing facility is not VLOG* certified</td>
<td>8/year or in the event of fewer number of uses per year: 1 sample per use</td>
</tr>
<tr>
<td>Dual stationary grinding and mixing facility at a VLOG facility</td>
<td>4/year</td>
</tr>
</tbody>
</table>

Table 8: Yearly minimum of sampling at the mobile/stationary grinding and mixing facilities sub-stage

* or certified according to a standard considered equivalent by VLOG
Retention of reference samples:
The reference samples of the samples taken must be retained for at least two months. In addition, for each of the three relevant categories\textsuperscript{13}, at least the last three reference samples must always be retained, even if they are more than two months old.

Mobile and stationary grinding and mixing facilities
For mobile and stationary grinding and mixing facilities, all samples from the last quarter must be retained.

Test frequency
All samples are to be tested in a VLOG-recognised laboratory.

A GMO testing of the sampled feed and feed mixtures must take place in accordance with the test plan and the requirements set out in Part J:

- at least once in each audit interval from the feed (delivery of risk-prone feed) or the feed mixture (from a grinding and mixing facility) with the highest risk

and also

- after every switching to “ohne Gentechnik” feeding, if a VLOG operating unit/VLOG stall regularly switches between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling.

\textbf{Explanation:} A switch to “ohne Gentechnik” feeding will take place, for example, in a production system where the lifetime of the animals is longer than the “ohne Gentechnik” minimum feeding conversion period (e.g. turkey fattening facility).

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.

\textbf{i} As of 1 January 2020, the mobile grinding and mixing facility operator is responsible for the sampling and testing of the relevant feed mixtures from the grinding and mixing facility as required in Table 8 and Table 9. The number of required samples and tests will be revised until 1 January 2020.

\textsuperscript{13} Delivery of risk-prone feed; use of mobile grinding and mixing facilities; switch between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling
Mobile grinding and mixing facilities

In the respective audit interval, at least the testing frequencies listed in Table 9 must be implemented in the business.

<table>
<thead>
<tr>
<th>Area</th>
<th>Minimum Testing Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>VLOG Certification of the mobile grinding and mixing facility</td>
<td>Feed for “ohne Gentechnik” production processed by the mobile grinding and mixing facility</td>
</tr>
<tr>
<td>The mobile grinding and mixing facility is VLOG* certified</td>
<td>1 test result per audit interval (sampling from mixed feed)</td>
</tr>
<tr>
<td>The mobile grinding and mixing facility is not VLOG* certified</td>
<td>1 test result per audit interval (sampling from mixed feed)</td>
</tr>
<tr>
<td>Dual stationary grinding and mixing facilities at a VLOG facility</td>
<td>1 test result per audit interval (sampling from mixed feed)</td>
</tr>
</tbody>
</table>

Table 9: Minimum number of tests in the sub-stage mobile/stationary grinding and mixing facility in the respective audit interval.
* or certified according to a standard considered equivalent by VLOG

E 4.9.1.4 Reduction of the Scope of Testing after Changing Feed in Group Organisations:

If the business regularly switches from “ohne Gentechnik” feeding to feeding with feed subject to compulsory labelling and participates in the VLOG system via a group organiser, then it is possible to reduce the scope of testing under the conditions explained below. This refers exclusively to testing after the feed switch; the number of tests required for incoming goods or when using grinding and mixing facilities cannot be reduced.

- Before the scope of testing can be reduced, the functionality of the switching system must be demonstrated by the group:
  - At least one test result is required for each site that regularly switches feed. The test results must come from a current feeding system and must meet the requirements of the current VLOG Standard.
  - After submitting the test results and, if necessary, other documents, the certification body will decide whether the group may make use of the reduced scope of testing. The decision must be documented.

- The switching system must be continuously validated:
  - At least one test after each feed switch must be carried out annually for at least 25% of the sites with regular feed changes.
o At least one sample must be taken annually by a VLOG certification body from at least 5% of the sites with regular feed changes after the feed change is carried out and this must be included in the test. These tests can be counted towards the 25%.

o The feed switch, including measures taken to avoid commingling and carryover must be documented in writing.

Explanation: A flow chart of this process is available in Annex VII.

If new businesses/sites join the group and also wish to take advantage of the reduced scope of testing, at least one test result must be submitted for each new site.

In the event of positive test results, the certification body (if necessary upon agreement with VLOG) will decide in each individual case whether an individual business or the entire group may continue to use the reduced scope of testing.

E 4.9.1.5 Handling of Positive Test Results

Positive feed test results are to be treated according to Annex V.

In the case of positive test results of unlabelled feed which, however, are clearly subject to compulsory labelling (e.g. milk with “ohne Gentechnik” production), residues of the feed must be immediately replaced or used outside of “ohne Gentechnik” production after the incorrect labelling becomes known. The responsible certification body must be notified immediately.

If a serious infraction of non-GMO feeding invalidating “ohne Gentechnik” labelling occurred through faulty labelling of feed, the minimum feeding conversion period for the animals concerned must start anew, if applicable, shortened according to specific circumstances.

Food which has already been marketed (e.g. milk with “ohne Gentechnik” labelling) needs not be recalled.

Explanation: 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 of the law firm [GGSC] 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 November 2015 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/).

E 4.10 Inspection of Outgoing Goods/Labelling on Bills of Lading

It must be ensured that only such products and animals that meet in full the Standard requirements for “ohne Gentechnik” and “VLOG” labelling leave the business.

VLOG-certified products/animals must be labelled on all bills of lading using the wording “VLOG”.

Page 80
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 which ensures the above-mentioned labelling.

E 5 Specific Requirements for Plant-based Feed Production

E 5.1 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.

The feeds produced internally must be documented in the feed list (see Chapter E 4.3).

Explanation: The GMO-free nature of the seeds and plant material is achieved, for example, by the absence of a label in accordance with Directive 98/95/EC on seed documents/declarations.

E 5.2 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

GMO carryover from GMO cultivation and/or GMO experimental releases into feed produced internally must be prevented. It must be periodically verified whether GMO cultivation or GMO experimental releases are taking place in the immediate vicinity of the fields and it must be evaluated whether this is affecting the operation’s own crops and, if applicable, whether corresponding cultivation distances are met.

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.

Explanation: If the facility description contains all points, no separate document will need to be created.

E 6 Specific Requirements for Animal Transport/Livestock Trade

E 6.1 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 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 of Chapters E 4.2 and E 4.5 must be met for the incoming goods of feed used in “ohne Gentechnik” production.
Explanation: There is no obligation to carry out sampling at the time of delivery, retention of reference samples or routine tests.

E 6.2 Risk Management

Besides Chapter E 3.3, the risk management including the risk analysis must consider the following points:

- Separate handling of VLOG animals and non-VLOG animals
- If applicable: handling of feed subject to compulsory labelling and feed that is not
- Other business-specific items as necessary

Explanation: In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with “ohne Gentechnik” it is only permissible to use feed not subject to compulsory labelling.

E 6.3 Commissioning External Service Providers

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

E 6.3.1 Animal Inventory

All VLOG animals/animal categories present within the business are to be taken into account. It must be determined whether the feeding of these animals is “ohne Gentechnik” compliant or whether no feeding takes place.

E 6.3.2 “ohne Gentechnik” Compliant Feeding

If the VLOG animals are fed, the Standard requirements regarding the following aspects must be complied with:

- Suitability/permissibility of the feed for “ohne Gentechnik” production (see Chapters E 3.3 and E 6.2).
- Documentation of feed used via feed list (see Chapter E 4.3)
- Documentation of feed rations (see Chapter E 4.4).

E 6.4 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

The risk-targeted process steps for ensuring the Standard 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.

At no time feed subject to compulsory labelling can make its way into the flow of feeds for “ohne Gentechnik” production. For this purpose, the goods flows are segregated spatially and/or temporally.

- 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 feed subject to compulsory labelling is reduced to a technically unavoidable minimum.
The risk-targeted process steps for ensuring the Standard requirements are documented for each operation and their efficacy reviewed as part of the self-monitoring process.

E 6.4.1 VLOG Animals

VLOG animals are always conveyed and/or transported separately from animals that are not VLOG certified. The following exceptions are possible:

- Animals/animal categories with identification of individual animals (e.g., cattle ear tags with a unique ID number for each animal):
  - When accepting animals, the animal identification must be checked; only properly identified animals are accepted.

- Animals 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.

*Explanation: The unique individual animal identification serves as sufficient verification of segregation.*

E 6.5 **Inspection of Outgoing Goods/Labelling on Bills of Lading**

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

VLOG-certified animals must be identified as “VLOG” animals, either individually or in group, on all accompanying documents.
Part F: Agricultural Group Organisation

F 1 Definition and Certification Obligation ................................................................. 85
F 2 Details of the Certification Procedure ................................................................. 86
F 2.1 Conditions and Requirements for the Certification ............................................ 86
F 2.2 Certification Procedure ...................................................................................... 86
   F 2.2.1 Application for Certification, Submission of Group Description ................. 87
   F 2.2.2 Initial Certification Based on Initial Data Collection by the Group Organiser ... 87
   F 2.2.3 Initial Certification on the Basis of 100% Audits by the Certification Body ..... 88
   F 2.2.4 Effects of Audit Results on Labelling and Marketing ................................... 88
   F 2.2.5 Certificate Issuance ....................................................................................... 88
   F 2.2.6 Modifying/Updating of the Members List ..................................................... 88
   F 2.2.7 Distribution of the Audit Report ................................................................... 89
F 2.3 Follow-up Certification and Monitoring/Audit Intervals ..................................... 89
F 2.4 KO Requirements ............................................................................................... 89
F 3 Requirements for Group Organisers ...................................................................... 90
   F 3.1 Group Description, Members List and Facility Description .............................. 90
   F 3.2 Contractual Binding of the Group Members (KO) ............................................ 90
   F 3.3 Commissioning of Multiple Certification Bodies .............................................. 91
   F 3.4 Risk Management (KO) ................................................................................... 91
   F 3.5 Implementation of the Requirements for Sampling and Testing ....................... 92
   F 3.6 Training of Staff and Group Members by the Group Organiser ....................... 92
   F 3.7 Handling of Non-compliant Feed, Products and Animals (KO) ....................... 93
   F 3.8 Complaint Management ................................................................................... 93
   F 3.9 Goods Recall .................................................................................................. 93
   F 3.10 Crisis Management (KO) ............................................................................... 93
   F 3.11 Corrective Action/Continuous Improvement Process ..................................... 94
   F 3.12 Documentation and Retention Periods ............................................................ 94
   F 3.13 Internal Audits ............................................................................................... 94
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.

**F 1 Definition and Certification Obligation**

The requirements for the Agriculture Stage (Part D) must apply to agricultural group members. Additionally, the requirements in Part E 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.

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification possible, despite absence of mandatory certification</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>VLOG agricultural group:</strong> A VLOG agricultural group is a combination of at least two agricultural operations (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Agricultural group organiser, hereinafter group organiser:</strong> Businesses in a VLOG agricultural group having responsibility for a risk management 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.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Agricultural group member, hereinafter group member:</strong> Agricultural operation which is contractually integrated into a VLOG agricultural group.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food of animal origin</td>
<td>Plant-based food</td>
<td>No</td>
<td>F 1-F 3</td>
<td></td>
</tr>
<tr>
<td>For the production and processing of food of animal origin.</td>
<td>For the production of plant-based food.</td>
<td>No</td>
<td>E 1-E 5</td>
<td></td>
</tr>
</tbody>
</table>
F 2  Details of the Certification Procedure

F 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\textsuperscript{14}

\textit{Explanation:}

- 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.

- “\textit{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 F 2.2.1, an initial collection of group member data has been done by the group organiser, an audit of the group member has been done by the certification body, if necessary, and the group member has been accepted by the certification body for the VLOG group.

F 2.2  Certification Procedure

Group certification in agriculture is to be performed in accordance with the following steps: (see Chapter F 2.2.1 to F 2.2.7)

- Application for certification made to a VLOG-recognised certification body and submission of the group description (see Chapter F 3.1) including risk grading of the agricultural operations.
- If applicable, initial collection of group member data by the group organiser
- Audit planning by the certification body with the 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, 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
  - including confirmation of the approved retail group members
- Certification of the VLOG agricultural group

The described process must also be applied to new group members.

\textsuperscript{14} Known as “Certification Agreement” up to 20 June 2017
F 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 F 3.1).

The group organiser must determine the basis on which the VLOG initial certification and the future approval of additional group members will be carried out (see Annex VIII):

- 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 F 2.2.2)
  or
- Audit of the group organiser and all group members by the certification body (see Chapter F 2.2.3).

The chosen initial certification procedure is 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 F 2.2.6).

Explanation: If the certification body selects the process of 25% audits, each facility must be audited by the group organiser prior to addition. Without an audit, the certification body can only accept a member if upon the 25% requirement is still met after its addition. If this is not the case, a corresponding number of facilities/candidates must be audited by the certification body in order to meet this value.

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

The certification body must perform an initial audit of 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 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 E 2.1. The group organiser 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. Information/documents that are missing or require correction are requested from the group organiser. 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 must compare the results of the initial data collections by the group organiser with its own results and 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 is to verify the grading of the group members into risk categories and will base the audit intervals of each group member for the coming audit period 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.
Explanation: See Annex VIII for a schematic representation of the group certification procedure.

The audit of the group organiser is generally done before the audits of the group members.

During the 25% audit, 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.

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

As an alternative to E 2.2.2, all audits are to be performed by the certification body (see Annex VIII):

The certification body must perform an initial audit of the group organiser.

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 members. The VLOG audits are the basis for the verification of the risk category grading and the decision on certification.

Explanation: The audit of the group organiser is generally done before the audits of the group members.

F 2.2.4 Effects of Audit Results on Labelling and Marketing

- 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 any 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”.

F 2.2.5 Certificate Issuance

The VLOG certificate will be issued for the VLOG agricultural group and must contain the business name of the group organiser. The group organiser is also to receive a list of members from the certification body. In the case of agricultural group certifications, the member list must include for each group member:

- the defined risk category
- the last routine audit date

for egg-laying businesses also:

- the print numbers.

F 2.2.6 Modifying/Updating of the Members List

The group organiser must immediately report changes and/or updates affecting the member list to the certification body.

Explanation: The members list is a list of the group members approved by the certification body for the VLOG agricultural group).
F 2.2.7 Distribution of the Audit Report

For each audit, 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.

Explanation: 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.

F 2.3 Follow-up Certification and Monitoring/Audit Intervals

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective measures by the 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 Class 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.

![Audit intervals of agricultural operations applicable to group certifications](image)

F 2.4 KO Requirements

The following KO requirements have been determined:

- Contractually Binding of the Group Members (F 3.2)
- Risk Management (F 3.4)
- Handling of non-compliant feed, products and animals (F 3.7)
- Crisis Management (F 3.10)
F 3 Requirements for Group Organisers

F 3.1 Group Description, Members List and Facility Description

Group Description
The group organiser must submit a current group description to the certification body when applying for VLOG certification. The group organiser must promptly notify the certification body of major changes in the group description pertaining to VLOG certification.

The group description must contain/provide at least:

- A list of the group members and a full 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
- A list of all areas for which the group organiser is responsible (e.g. risk management, self-monitoring of the agricultural operations, sampling, testing, etc.)
- The persons in charge of group certification for the group organiser, including their contact data
- The basis used for the initial VLOG certification and the approval of additional group members in the future (100% or 25% audits by the certification body)

Members list
The current members list for the group certification must have been submitted. 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.

The group organiser must immediately notify the certification body of changes to the members list.

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

Facility Description
The group organiser is responsible for the facility descriptions of the group members and for keeping them up to date. The group organiser must notify the certification body promptly of internal facility changes that affect the certification. The certification body decides whether additional audits must be performed outside the regular intervals.

Explanation: Major changes pertaining to VLOG certification include, e.g. risk grading, other products and/or processes.

F 3.2 Contractual Binding of the Group Members (KO)

The group members must be bound to the retail 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 risk management. By signing the agreement, members undertake to implement any corrective actions and deadlines as instructed by the group organiser. Each group member must sign the declaration of participation/agreement.

F 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 certification 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 the respective group or its scope of applicability.
- the group description must be submitted to each certification body.
- the certification body must also audit the group organiser’s compliance with the requirements in the determined scope of certification. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an on-site audit of the group organiser.
- the certification body is to issue one certificate depending on the scope of certification.
- a written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is required.

The group organiser ensures that all activities necessary for certification are performed.

F 3.4 Risk Management (KO)

Risk analysis

A documented risk analysis must be submitted for all relevant feed, products, animals, procedures and processes for which the group organiser is responsible. The risk analysis must contain the assessment of risks affecting “ohne Gentechnik” labelling (analogous to the HACCP concept).

The risk analysis must at least include:

- Animals and feed for the “ohne Gentechnik”/“VLOG” area
- Handling of feed, animals and products that meet the requirements for “ohne Gentechnik” labelling and those that do not meet the requirements for “ohne Gentechnik” labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous freight in the case of vehicles
- Suppliers (certifications, contracts, reliability, etc.)
  - Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions must be introduced and implemented for the identified risks based on the risk analysis.

There must be an annual review of the risk management, including a review of the group description, e.g. as part of an internal audit.
F 3.5 Implementation of the Requirements for Sampling and Testing

Sampling and test plan
The group organiser must submit a written sampling and testing plan for the group members that defines the risk-based sampling and GMO testing of the risk-prone feed in the business relevant for “ohne Gentechnik” production. The group organiser has to ensure compliance with the sampling and testing plan. The various production/processing technologies of the group members must be taken into account when generating the sampling and testing plan.

The sampling and testing plan, in compliance with the requirements listed in Part J, must contain/define at least the following:

- written, documented risk analysis of the risk-prone feed used and the associated definition of the risk-prone feed to be sampled/tested
- description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sample documentation, clear sample identification)
- frequency and time intervals of sampling and GMO testing
- Determination of the parameters to be tested for (see Annex IV)
- Description of the testing procedure (commissioned laboratory, scope of testing).

The sampling and test plan is to be implemented according to schedule.

Test frequency
At minimum, the testing results required per Chapter E 4.9 must be submitted for each agricultural group member within the respective audit interval.

Evaluation of testing data
The group organiser must:

- collect the test results of the group members, and evaluates these at least once per year. These evaluations must be conducted for each group member
- perform a supplier evaluation based on the evaluation results
- define risk-based measures for the group members as applicable

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

Explanation: If collective samples of feed are tested, the results may not be factored as test results pertaining to individual operations.
Sampling and GMO testing is not required if the utilised risk-prone feed cannot be tested for genetic engineering for technical reasons.

F 3.6 Training of Staff and Group Members by the Group Organiser

All staff members of the group organiser involved in the operating procedures of relevance to “ohne Gentechnik” certification are to be trained concerning the “ohne Gentechnik” requirements and the operating procedures laid down for this purpose. Training is to take place before they begin with their
activity, as well as on an ongoing basis, and at least once a year. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

The group organiser transmits to the group members all relevant requirements and information related to “ohne Gentechnik” production. Communication of the information is to be documented.

*i* Explanation: *Staff members of the group organiser involved in the operating processes of relevance to “ohne Gentechnik” certification include, e.g. QM, Procurement etc.*

**F 3.7 Handling of Non-compliant Feed, Products and Animals (KO)**

The group organiser must establish an effective and documented procedure handling non-compliant feed, products and animals. This is to include at least the following steps:

- labelling of affected feed, products and animals
- notification of customers/buyers, suppliers and group member(s)
- error management
- initiation, monitoring, evaluation and documentation of corrective actions
- blocking and release of feed, products and animals
- documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

*i* Explanation: *Non-compliant feed must be identifiable, e.g. based on positive test results.*

**F 3.8 Complaint Management**

A documented system must be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be coordinated with the affected group members and initiated for justified complaints and feedback.

**F 3.9 Goods Recall**

An effective and documented procedure for goods recall, including definition of responsibilities, must be in place for non-compliant products according to the VLOG Standard. This is to include the immediate written notification of customers.

**F 3.10 Crisis Management (KO)**

The group organiser is responsible for the crisis management of the entire VLOG group.

An up-to-date and documented procedure must exist for managing potential crisis situations that may impact product quality and the legitimacy of “ohne Gentechnik” products. This procedure has been implemented and at a minimum includes:

- steps to follow in the event of a crisis
- assigned responsibilities including substitute rules
• availability (within and outside of business hours)
• list of emergency phone numbers
• regulation for the immediate notification of the VLOG corporate office, the certifier and any affected business partners and customers
• legal advice (if required)

The crisis management procedure is to be periodically tested internally at least once a year with regard to practicality, functionality and immediate implementation, with results to be documented.

F 3.11 Corrective Action/Continuous Improvement Process

If internal audits, external audits, or complaints management result in the identification of deviations from Standard requirements, the group organiser, if applicable together with the group members, must take and document corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.

F 3.12 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not possible. All documents relating to the group certification and “ohne Gentechnik” labelling are to be retained for the following period, unless statutory provisions require a longer retention period: at least five years.

Explanation: Documents that must be retained are e.g. delivery slips, supplier evaluations, training documents, etc.

F 3.13 Internal Audits

The group organiser is to perform annual internal audits which at a minimum must cover the general and business-specific Standard requirements for the Group Organiser stage organiser. The internal auditors must have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.
Part G: Food Processing/Preparation

G 1 Stage Definition and Mandatory Certification

G 2 Details of the Certification Procedure

G 2.1 Risk Grading

G 2.2 Audit Frequency

G 2.3 KO Requirements

G 3 General Requirements

G 3.1 Facility Description

G 3.2 Assignment of Responsibilities/Organisational Chart

G 3.3 Risk Management (KO)

G 3.4 Commissioning External Service Providers

G 3.5 Incoming Goods Inspection (KO)

G 3.6 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

G 3.7 Handling of Non-compliant Raw Materials/Products (KO)

G 3.8 Inspection of Outgoing Goods/Labelling on Bills of Lading (KO)

G 3.9 Traceability (KO)

G 3.10 Complaint Management

G 3.11 Goods Recall

G 3.12 Crisis Management (KO)

G 3.13 Corrective Action/Continuous Improvement Process

G 3.14 Documentation and Retention Period

G 3.15 Staff Training

G 3.16 Internal Audits

G 4 Specific Requirements for Plant-Based Raw Materials

G 4.1 Sampling and Testing

G 4.1.1 Sampling and Test Plan

G 4.1.2 Frequency of Sampling and Testing

G 4.1.3 Handling of Positive Test Results

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

G 6 Specific Requirements for Transport, Storage, Handling and/or Trading
In the following part, the specific rules and requirements for the Food Stage and its sub-stages are described.

**G 1 Stage Definition and Mandatory Certification**

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification possible, despite absence of mandatory certification</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Food preparation:</strong> 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 and slaughter of animals.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>Food processing:</strong> Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding, filtrating or a combination of these various processes (Regulation (EC) No. 852/2004).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food of animal origin/ingredients</td>
<td>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”.</td>
<td>No relevant areas</td>
<td>No</td>
<td>G 1-G 3, G 5, J 3</td>
</tr>
<tr>
<td></td>
<td>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).</td>
<td>No relevant areas</td>
<td>No</td>
<td>H 1-H 3</td>
</tr>
<tr>
<td>Plant-based food/ingredients</td>
<td>For plant-based products which are to be labelled “ohne Gentechnik” and for which all of the following two criteria have been met:</td>
<td>No relevant areas</td>
<td>Yes</td>
<td>G 1-G 5, J 3</td>
</tr>
<tr>
<td></td>
<td>• The preparation/processing is done outside of Germany.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Sub-stage

<table>
<thead>
<tr>
<th>Certification required according to VLOG Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>• They consist of plant-based ingredients for whose species there is a GMO cultivation authorisation in a given country in the world. 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 G 5).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Certification not required according to VLOG Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>No relevant areas</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Certification possible, despite absence of mandatory certification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>G 1-G 5, J 3</td>
</tr>
</tbody>
</table>

Food transport and trading in food is assigned to the Logistics stage. The Checklist for the Logistics Stage (see Annex XIV) is to be used.
G 2  Details of the Certification Procedure

G 2.1  Risk Grading

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.

Risk Category 1

- There is a medium risk.
- Businesses and process steps with clear physical 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.

Risk Category 2

- High risk of commingling GMO-free raw materials with such containing GMOs
- Businesses and process steps without physical 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.

G 2.2  Audit Frequency

Routine audits are to be carried out annually.

G 2.3  KO Requirements

The following KO requirements have been determined:

- Risk management (G 3.3)
- Incoming goods inspection (G 3.5)
- Segregation of goods flows/exclusion of commingling and swapping (G 3.6)
- Handling of non-compliant raw materials/products (G 3.7)
- Inspection of outgoing goods/labelling on bills of lading (G 3.8)
- Traceability (G 3.9)
- Crisis management (G 3.12)
G 3 General Requirements

G 3.1 Facility Description

The facility description in accordance with Annex XXV must be on file and up-to-date.

The certification body is to be promptly informed about major changes pertaining to VLOG certification.

Explanation: 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. Major changes pertaining to the certification include, e.g., changes in risk grading, other products and/or processes.

G 3.2 Assignment of Responsibilities/Organisational Chart

A current organisational chart must show responsibilities and assigned substitute rules.

Explanation: 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.

G 3.3 Risk Management (KO)

Risk analysis

A documented risk analysis must be established for all relevant raw materials, products, procedures and processes, including risk assessment for “ohne Gentechnik” labelling (analogous to the HACCP concept).

The risk analysis must at a minimum cover the following points:

- Raw materials and products (including additives, enzymes, microorganism cultures, processing aids and substances within the meaning of Sec. 3 (5, EGGentDurchfG for the “ohne Gentechnik”/“VLOG” area (incl. countries of origin)
- Handling of raw materials/products for which “ohne Gentechnik”/“VLOG” labelling would be permissible, and raw materials/products that do not meet the requirements for “ohne Gentechnik”/“VLOG” labelling
- Production processes and facility parameters
- Procedures for cleaning, previous freight in the case of vehicles
- Suppliers (certifications, contracts, reliability, etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions must be introduced and implemented for the identified risks based on the risk analysis.
G 3.4 Commissioning External Service Providers

If activities subject to certification in the area of food processing/food preparation, transport, storage or transhipping by VLOG-certified business to external, non-VLOG-certified service providers, these entities must be included in the risk management (see Chapter G 3.3) of the business, and must have signed an agreement to comply with the requirements of the VLOG Standard (see Chapter A 3.2.1).

In the area of food processing/food preparation, compliance with the agreement is to be documented at least once per year by the commissioning business, and the results are documented.

External service providers not integrated into the risk management of the VLOG-certified business must be certified according to the VLOG Standard or another standard recognised as equivalent.

G 3.5 Incoming Goods Inspection (KO)

With regard to incoming goods, it must be ensured that all “ohne Gentechnik”/“VLOG” raw materials and products meet the requirements (see Chapter A 1.3.2 and A 1.4).

Incoming goods inspection of non-VLOG-certified animal raw materials/products:

A certification according to the VLOG Standard or another standard recognised as equivalent must exist for all raw materials and products of animal origin used.15

- The certification of the supplier according to a standard recognised as equivalent is to be verified regularly, at least once per year.

Incoming goods inspection of VLOG-certified raw materials/products:

- The bills of lading are to be checked for the “VLOG” label within the scope of incoming goods processing.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

A complaint is to be issued to the supplier for incomplete bills of lading. If, for systemic reasons, no delivery slips/shipping documents are prepared (e.g. milk collection), there must be a clear contractual provision regarding delivery.

Incoming goods inspection of non-VLOG-certified raw materials/products of non-animal origin:

For all raw materials not of animal origin, the supplier must submit:

- a GMO-Free Certificate according to the VLOG “Ohne Gentechnik” Production and Certification Standard (Annex I).

The business is to verify once per year, in an expedient manner, whether the certification in the issued form is still valid and whether the specification for the article remains unchanged.

15 Honey or other apiculture products that are not certified under the VLOG Standard or Council Regulation (EC) 834/2007 may be processed into “Ohne Gentechnik” food if it can be evidenced that no GMOs are cultivated or released within a circumference of 10 km from the apiaries or, alternatively, that there is an analytical result for a batch that was assessed pursuant to VLOG specifications and that shows no genetic modification.
Explanation: For non-VLOG-certified raw materials/products not of animal origin, in addition to the supplier certification, a note and/or clear contractual provision may be included in the bill of lading.

For the labelling of non-VLOG-certified raw materials/products that meet the requirements of EGGenTDurchfG and the VLOG Standard, VLOG recommends the following wording on the bills of lading: “Ingredient suitable for the production of “ohne Gentechnik”-labelled food.”

G 3.6 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

The physical and/or temporal segregation of goods flows must ensure that raw materials/products not suitable for “ohne Gentechnik”/“VLOG” labelling at no time come into contact with the goods flows of the products destined for “ohne Gentechnik”/“VLOG” labelling. Where necessary, interim cleaning must be performed.

In addition, all raw materials/semi-finished products/finished products must be clearly and consistently labelled on all process steps.

G 3.7 Handling of Non-compliant Raw Materials/Products (KO)

An effective and documented procedure for handling non-compliant raw materials/products must be in place.

This must include at least the following steps:

- labelling of affected raw materials and products
- notification of customers/buyers and suppliers
- error management
- initiation, monitoring, evaluation and documentation of corrective actions
- blocking and release of raw materials and products
- documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

Explanation: Non-compliant raw materials or products must be identifiable, e.g. based on positive test results.

G 3.8 Inspection of Outgoing Goods/Labelling on Bills of Lading (KO)

VLOG-certified raw materials and products must be clearly labelled on all bills of lading using the wording “VLOG” and/or the “Ohne GenTechnik” seal (see Chapter A 1.2.1). It must be clearly evident to which raw materials/products the labelling refers.

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 which ensures the above-mentioned labelling.
Explanation: For the labelling of non-VLOG-certified raw materials/products that meet the requirements of EGGenTDurchfG and the VLOG Standard, VLOG recommends the following wording on the bills of lading: “Ingredient suitable for the production of “ohne Gentechnik”-labelled food.” For advertisement and placement on the German market, only the use of the words “ohne Gentechnik” is permitted.

G 3.9 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- all “ohne Gentechnik”/“VLOG” raw materials and products present in the business can be clearly identified at all times.
- The goods flow of “ohne Gentechnik”/“VLOG” raw materials and products as well as quantity lists and evaluations must be generated within one working day to allow for conclusions about goods flows and their plausibility.

Explanation: For this purpose, the following data is to be determined, among others:

- Information on supplier and delivery date
- Quantity
- Creation of batches, if applicable (including re-working)
- Information on delivery date and supplied customers

G 3.10 Complaint Management

A documented system must be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

G 3.11 Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, must be in place for non-compliant raw materials and products according to the VLOG Standard. This also is to include immediate notification of customers by phone and in writing.

G 3.12 Crisis Management (KO)

An up-to-date and documented procedure must exist for managing potential crisis situations that may impact product quality and the legitimacy of “ohne Gentechnik” products. This procedure is to be implemented and must at a minimum include:

- steps to follow in the event of a crisis
- assigned responsibilities including substitute rules availability (within and outside of business hours)
- list of emergency phone numbers
• regulation for immediate notification of the VLOG Head Office, the certifier and any affected business partners and customers
• legal advice (if required)

The crisis management procedure is to be periodically tested internally at least once a year with regard to practicality, functionality and immediate implementation, with documented results.

G 3.13 Corrective Action/Continuous Improvement Process

If internal audits, external audits complaints management and non-compliant, raw materials or products lead to the identification of deviations from Standard requirements, the business must take corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.

G 3.14 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not possible.

All documents relating to the “ohne Gentechnik” labelling 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.

Explanation: Documents that must be retained include bills of lading, clearance certification, records of production and goods flows (including reworking), training documents, etc.

G 3.15 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 at least once a year.

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

Explanation: 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 “ohne Gentechnik” operating procedure.

G 3.16 Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business-specific Standard requirements of the Food Processing/Food Preparation stage. The internal auditors must have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.
G 4 Specific Requirements for Plant-Based Raw Materials

G 4.1 Sampling and Testing

Risk-based sampling and GMO testing of raw materials and products relevant for “ohne Gentechnik” products is to be performed according to the following statements.

G 4.1.1 Sampling and Test Plan

A written sampling and test plan must be available that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, at a minimum is to contain/define the following:

• description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
• frequency and time intervals of the sampling and GMO testing
• determination of the parameters to be tested for (see Annex I)

The sampling and test plan is to be implemented according to schedule.

Sampling and GMO testing is not required if the utilised raw materials and products cannot be tested for genetic engineering for technical reasons.

In this case the test plan must provide for a risk analysis that concludes no need to sample/test any raw materials/products.


G 4.1.2 Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in Table 10 annually, at minimum.

All samples are to be tested by a VLOG-recognised laboratory.

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>2 x per year</td>
</tr>
<tr>
<td>1</td>
<td>6 x per year</td>
</tr>
<tr>
<td>2</td>
<td>12 x per year</td>
</tr>
</tbody>
</table>

Table 10: Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods

Explanation: 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 Table 10.

G 4.1.3 Handling of Positive Test Results

Positive test results are to be treated according to Annex VI.
The affected raw materials and products present in the business are to be handled as outlined in Chapter G 3.7.

**G 5 Specific Requirements for Risk-Prone Raw Materials/Ingredients**

Specific requirements for risk-prone raw materials (e.g. rice, salmon) are to be determined outside the VLOG Standard in the document Risk-Prone Raw Materials/Ingredients (https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english-Version_19.01/Specific_Requirements_for_Risk-Prone_Raw_Materials-Ingredients_181001.pdf). The overview is to be updated regularly based on risk.

**G 6 Specific Requirements for Transport, Storage, Handling and/or Trading**

If the business performs activities in the area of transport, storage, handling and/or trading of food that are subject to the certification obligation, the relevant requirements according to Chapter B 1 to B 5 must be complied with. The Checklist for the Logistics Stage (see Annex XIV) is to be used.
Part H: Retail Stage – Sale of Bulk Food of Animal Origin

H 1  Stage Definition and Mandatory Certification ................................................................. 107

H 2  Details of the Certification Procedure ............................................................................. 108

H 2.1  Conditions and Requirements for Retail Group Certification .................................. 108

H 2.2  Certification Process .................................................................................................... 108

H 2.2.1  Audit Intervals and Scope of the Audit ................................................................. 108

H 2.2.2  Effect of Audit Results on Labelling and Marketing ........................................... 109

H 2.2.3  Certificate Issuance .................................................................................................. 109

H 2.2.4  Distribution of the Audit Report .............................................................................. 109

H 2.2.5  KO Requirements .................................................................................................... 109

H 3  Requirements for Group Organisers and Group Members .............................................. 110

H 3.1  Group Description ....................................................................................................... 110

H 3.2  Contractual Binding of the Group Members (KO) .................................................. 111

H 3.3  Commissioning of Multiple Certification Bodies ....................................................... 111

H 3.4  Risk Management (KO) ............................................................................................ 111

H 3.5  Procurement (Suppliers and Producer Certification) ................................................ 112

H 3.6  Incoming Goods Inspection (KO) ............................................................................. 112

H 3.7  Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO) ........ 112

H 3.8  Processing .................................................................................................................. 113

H 3.9  Training of Staff and Group Members by the Group Organiser .................................. 113

H 3.10  Handling of Non-compliant Raw Materials/Products (KO) .................................... 113

H 3.11  Labelling .................................................................................................................... 114

H 3.12  Traceability (KO) ...................................................................................................... 114

H 3.13  Crisis Management (KO) .......................................................................................... 114

H 3.14  Corrective Action/Ongoing Improvement Process .................................................. 115

H 3.15  Documentation and Retention Periods .................................................................... 115

H 3.16  Internal Audits .......................................................................................................... 115
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.

H 1 Stage Definition and Mandatory Certification

<table>
<thead>
<tr>
<th>Sub-stage</th>
<th>Certification required according to VLOG Standard</th>
<th>Certification not required according to VLOG Standard</th>
<th>Certification possible, despite absence of mandatory certification</th>
<th>Requirements according to the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail: Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>VLOG retail group: A VLOG retail group is a combination of branch operations (the so-called retail group members) for the purpose of VLOG group certification in retail.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail group organiser, hereinafter group organiser: Business in a VLOG retail group having responsibility for a risk management 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.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail group member, hereinafter group member: Branch/site contractually integrated into a VLOG group.</td>
<td>For bulk goods of animal origin at a central distribution facility and counter sales, labelled with the “Ohne GenTechnik” seal</td>
<td>No relevant areas.</td>
<td>Yes</td>
<td>H 1-H 3, J 3</td>
</tr>
</tbody>
</table>
H 2 Details of the Certification Procedure

H 2.1 Conditions and Requirements for Retail Group Certification

- Contract between the group organiser and a VLOG-recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG

Explanation: 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 food processing/preparation (see Part G) must also be taken into account within the business and in the VLOG certification.

H 2.2 Certification Process

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

- Application for certification made to a VLOG-recognised certification body and submission of the group description (see Chapter H 3.1)
- Audit planning by the certification body with the group organiser according to Chapter A 3.6 (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 3.9
- Audit evaluation/review by the certification body in accordance with Chapter A 3.9.2
  - 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 H 2.2.1 to H 2.2.4.

H 2.2.1 Audit Intervals and Scope of the Audit

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective measures by the group members.

Initial certification

The certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

- 10% of the group members per year if “ohne Gentechnik”/“VLOG” food is centrally purchased
- 100% of the group members if the “ohne Gentechnik”/“VLOG” food may be purchased locally by the branches.

---

16 Known as “Certification Agreement” up to 20 June 2017.
**Follow-up Certification**

The certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

- 10% of the group members per year if “ohne Gentechnik”/”VLOG” food is centrally purchased
- 100% of the group members if the “ohne Gentechnik”/”VLOG” food may be purchased locally by the branches.

*Explanation: If all the audit criteria, including original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.*

**H 2.2.2 Effect of Audit Results on Labelling and Marketing**

- 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.

**H 2.2.3 Certificate Issuance**

The certificate is to be issued to headquarters for the “bulk goods” area of application in accordance with Chapter A 3.11. 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.

For the Retail group certification, the member list must contain, for each branch:

- The last routine audit date.

**H 2.2.4 Distribution of the Audit Report**

For each audit, the group organiser and/or the audited group member are to receive an audit report 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.*

**H 2.2.5 KO Requirements**

- Contractually binding of the group members (H 3.2)
- Risk management (H 3.4)
- Incoming goods inspection (H 3.6)
- Segregation of goods flows/exclusion of commingling and swapping (H 3.7)
- Handling of non-compliant raw materials/products (H 3.10)
- Traceability (H 3.12)
- Crisis management (H 3.13)
H 3 Requirements for Group Organisers and Group Members

H 3.1 Group Description

The group organiser submits a current group description to the certification body when applying for VLOG certification.

The group description must contain/provide at least:

- An organisational chart of the business including details of responsibilities and a deputy plan to cover for absences for the operating procedure relevant to “ohne Gentechnik”.
- 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”/“VLOG” 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 data
- A list of all areas for which the group organiser is responsible (e.g. risk management, crisis management, etc.) For further processing of bulk “ohne Gentechnik”/“VLOG” 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-work
- List of all authorised suppliers of “ohne Gentechnik” food/ingredients

The retail group description must be kept up to date by the group organiser. The group organiser must promptly notify certification body of internal changes in the business pertaining to the certification. 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. 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.

Explanation: The designation of responsibilities within the organisational chart, within the branches may be linked to functions/job descriptions.

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 documents to be submitted to the auditor can be made available electronically. 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.

**H 3.2 Contractual Binding of the Group Members (KO)**

The group members must be bound to the retail group organiser by a contract/participation statement requiring compliance with the VLOG Standard and with the requirements and obligations of the individual group’s risk management. The participation statement/contract must be signed by the group member.

**H 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 certification 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 scope of applicability.
- the group description is to be made available to every certification body.
- the certification body must also audit the group organiser’s compliance with the requirements in the determined scope of applicability. Depending on the area of responsibility, the audits may be conducted at the headquarters or at the retail group member. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for every certification body to independently perform an on-site audit of the group organiser.
- each certification body is to issue one certificate depending on the scope of certification.
- a written agreement between the certification bodies that governs the exchange of information and the respective sphere of responsibility is required.
- the group organiser ensures that all activities necessary for certification are performed.

**H 3.4 Risk Management (KO)**

**Risk analysis**

A documented risk analysis is to be submitted for all relevant raw materials, products, procedures and processes for which the group organiser is responsible. This must include evaluation of the risks for “ohne Gentechnik” labelling (analogous to the HACCP concept).

The risk analysis must include at least:

- raw materials and products for the “ohne Gentechnik”/“VLOG” area
- handling of raw materials and products that meet the requirements for “ohne Gentechnik” labelling, and raw materials and products that do not meet the requirements for “ohne Gentechnik” labelling
- cleaning and disinfection procedure
- suppliers (certifications, contracts, reliability, etc.)
- sales/Declaration
• other business-specific items as necessary

Risk management

Preventive, monitoring and control actions must be introduced and implemented for the identified risks based on the risk analysis.

There must be an annual review of the risk management, including a review of the group description, e.g. as part of an internal audit.

Explanation: 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”/“VLOG” 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.

H 3.5  Procurement (Suppliers and Producer Certification)

A system must be in place for approval of suppliers and articles. The ordering of bulk and packaged “ohne Gentechnik”/“VLOG” goods is to be transparent.

For bulk “ohne Gentechnik”/“VLOG” goods, the following documents are to be available:

• List of suppliers
• List of articles
• Specifications

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

H 3.6  Incoming Goods Inspection (KO)

At goods receiving, it is to be ensured that all “ohne Gentechnik”/“VLOG” raw materials and products meet the requirements (see Chapter A 1.3.2 and A 1.4).

• A documented check of the “VLOG” label is to be performed on packaging and delivery slips and/or invoices.
• The Supplier’s certification is to be checked.
• The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

H 3.7  Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

Physical and/or temporal segregation of the goods flows must guarantee that at no time products not suitable for “ohne Gentechnik” labelling not come into contact with the goods flows of products destined for “ohne Gentechnik” labelling. Where necessary, interim cleaning must be performed.

In addition, all raw materials/semi-finished products/finished products must be clearly and seamlessly labelled on all process steps.
Explanation: The goods must be segregated physically (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”/”VLOG” raw materials/semi-finished products/finished products.

Joint storage of bulk “ohne Gentechnik”/”VLOG” 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”/”VLOG” products must be prepared prior to being used for “ohne Gentechnik”/”VLOG” 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 risk management.

H 3.8  Processing

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

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

H 3.9  Training of Staff and Group Members by the Group Organiser

All staff members of the group organiser involved in the operating procedures of relevance to “ohne Gentechnik” certification are to be trained concerning the “ohne Gentechnik” requirements and the operating procedures laid down for this purpose. Training is to take place before they begin with their activity, as well as on an ongoing basis, and at least once a year. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

The group organiser transmits to the group members all relevant requirements and information related to “ohne Gentechnik” production. Communication of the information is to be documented.

Explanation: Staff members of the group organiser involved in the operating processes of relevance to “ohne Gentechnik” certification include, e.g., QM, Procurement etc.

H 3.10  Handling of Non-compliant Raw Materials/Products (KO)

An effective and documented procedure must be in place for dealing with non-compliant raw materials/products. This includes, at a minimum:

- labelling of affected raw materials and products
- notification of the suppliers and group organiser and/or group member
- error management
- initiation, monitoring, evaluation and documentation of corrective actions
- blocking and release of raw materials and products
- documentation and analysis of incidents

Responsibilities are to be defined in the procedure.
H 3.11 Labelling

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

H 3.12 Traceability (KO)

The introduced/installled traceability system must guarantee that:

- All “ohne Gentechnik”/“VLOG” raw materials and products in the business can be clearly identified at all times.

- The goods flow of “ohne Gentechnik”/“VLOG” raw materials and products as well as quantity lists and evaluations can be generated within one working day to allow for conclusions about goods flows and their plausibility.

The following data is to be collected to this end:
- Information on supplier and delivery date
- Quantity
- Batch formation, if applicable (including re-working)
- Information on delivery date and supplied customers

The sale, refinement, write-offs, and inventory adjustments of bulk “ohne Gentechnik”/“VLOG” 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.

H 3.13 Crisis Management (KO)

An up-to-date and documented procedure must be introduced for managing potential crisis situations that may impact product quality and the legitimacy of “ohne Gentechnik” products. This procedure is to be implemented, must take into account all branches, and has to comprise, at a minimum:

- steps to follow in the event of a crisis
- assigned responsibilities, including substitute rules
- availability (within and outside of business hours)
- list of emergency phone numbers
- regulation for the immediate notification of the VLOG corporate office, the certifier and any affected business partners and customers
- Legal advice (if required)

The crisis management procedure must be tested internally at least once a year with regard to practicality, functionality and immediate implementation, with documented results.
H 3.14 Corrective Action/Ongoing Improvement Process

If deviations from the requirements according to the Standard are identified in the scope of internal audits, external audits and complaint management, the business must take corrective actions in order to prevent recurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness is to be reviewed within a reasonable time interval. Both are to be documented.

H 3.15 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not possible.

All documents relating to the “ohne Gentechnik” labelling are to be retained for the following period, unless statutory provisions require a longer retention period: at least two years.

Explanation: Documents that must be retained include bills of lading, supplier declarations, records of product and goods flows (incl. rework), training documents, etc.

H 3.16 Internal Audits

The group organiser must perform annual internal audits in the business of the group organiser and all branches. At a minimum, these audits must cover all general and business-specific requirements according to the Standard for the Retail stage. The internal auditors must have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected areas.

In the scope of the internal audit, annually or per branch, at least two risk-based random sample checks are to be performed for goods tracing, incl. quantity comparison, and the results are documented. Compound food products are also taken into account, if produced by the business or at its branches.

The following additional points are to be checked:

- “ohne Gentechnik”/“VLOG” labelling in the business
- Currentness and implementation of process and work instructions
Part I: Requirements for Certification Bodies, Auditors, Evaluators and Certifiers

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Title</th>
<th>Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>I 1</td>
<td>Requirements for Certification Bodies</td>
<td>117</td>
</tr>
<tr>
<td>I 2</td>
<td>Requirements for Auditors</td>
<td>118</td>
</tr>
<tr>
<td>I 3</td>
<td>Requirements for Evaluators/Certifiers</td>
<td>119</td>
</tr>
</tbody>
</table>
In the following part, the specific rules and requirements for certification bodies, auditors, evaluators and certifiers are described.

I 1 Requirements for Certification Bodies

The certification body must be recognised or approved by VLOG for VLOG certification and has to hold a corresponding Standard Usage Agreement with VLOG.

The certification body must demonstrably hold a valid accreditation according to ISO/IEC 17065 in at least one standard for the food and feed business.

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

The certification body must review and confirm the professional qualification and competence of the auditors and evaluators/certifiers, and must use respectively 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 “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 have sufficient staff for evaluating and certifying VLOG audits. Evaluation and certification may be performed by the same person.

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 following audit results/documents in German or English:

<table>
<thead>
<tr>
<th>Audit type/ Stage</th>
<th>Documents to be submitted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial or routine audits:</td>
<td>• Current facility description</td>
</tr>
<tr>
<td></td>
<td>• VLOG checklist(s)</td>
</tr>
<tr>
<td></td>
<td>• VLOG certificate</td>
</tr>
<tr>
<td></td>
<td>• Other certification-related documents, if necessary</td>
</tr>
<tr>
<td>Group certifications:</td>
<td>• Group Description</td>
</tr>
<tr>
<td></td>
<td>• VLOG Checklist</td>
</tr>
<tr>
<td></td>
<td>• VLOG certificate</td>
</tr>
<tr>
<td></td>
<td>• Members list</td>
</tr>
</tbody>
</table>
### Audit type/ Stage | Documents to be submitted
--- | ---
|  | • Upon request by VLOG, the certification body must promptly make available to VLOG the following documents in German or English\(^\text{17}\):
|  | - Audit results of the group members
|  | - Current list of members

#### Matrix certification:
- Matrix description
- VLOG Checklist
- VLOG certificate
- List of sites
- Upon request by VLOG, the certification body must promptly make available to VLOG the following documents in German or English\(^\text{17}\):
  - Audit results of the matrix members and matrix sites
  - Current list of sites

#### Follow-up audit/sample audit/audits in suspicious cases:
- VLOG checklist including annexes of relevance to certification
- VLOG certificate, if necessary

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.

#### 1.2 Requirements for Auditors

- 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 auditor must have participated in a VLOG-approved training on the VLOG Standard and must have successfully passed the associated examination. The validity period of the training certificate extends until a new certificate is issued, but not later than the end of the second following year (relative to the training date).

\(^\text{17}\) The certification body must cover the costs for the translation.
Before expiry of the training certificate, a continuing education training must be successfully completed. If this has not been done, further VLOG audits must not be performed after expiry of the certificate.

- An auditor may not carry out the routine audit in the same business on more than three sequential occasions.
- An auditor does not perform audits of businesses, producers, or producer groups for which he provided consulting in the previous two years.
- The auditor is to comply strictly with the business’s and the certification body’s procedures for the confidential treatment of information and records.

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

I 3 Requirements for Evaluators/Certifiers

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 Standard. The validity period of the training certificate extends until a new certificate is issued, but not later than the end of the second following year (relative to the training date). After expiry of the training certificate, no further “ohne Gentechnik” audits are performed unless the evaluator/certifier has completed a further training session.
Part J: Requirements for Laboratories and Tests

J 1 Requirements for Commissioning a Test ................................................................. 121
J 2 General Requirements and Recognition by VLOG ..................................................... 121
J 3 Methodological Requirements ............................................................................. 122
   J 3.1 Testing Process ............................................................................................... 122
   J 3.2 Protecting the Analytical Procedure................................................................. 123
   J 3.3 Approval of Test Results ................................................................................. 123
   J 3.4 Requirements for Test Reports ....................................................................... 123
   J 3.5 Interpretation of the Test Results – Test and Evaluation Criteria.................... 124
J 1  **Requirements for Commissioning a Test**

The client commissioning the GMO test undertakes:

- To check the VLOG recognition of the commissioned laboratory (see J 2) regularly, 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 bills of lading/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 J 2 and J 3.

**Explanation:** The compliance with the requirements 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.

**Requirements for Laboratories**

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

J 2  **General Requirements and Recognition by VLOG**

- The laboratory must be recognised by VLOG\(^\text{18}\).
- The laboratory 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**

- Subcontracting of (partial) tests is permitted under the following conditions:
  - All laboratories involved in GMO testing must be recognised by VLOG and comply with the method specifications of the VLOG Standard applicable to their scope of operation.
  - Compliance with the VLOG Standard is to be agreed between the participating laboratories in writing.

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– VLOG-recognised laboratories must document 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.

– If multiple laboratories participate in the testing, the conclusive evaluation of the sample per Chap. J 3.5 must be performed by a VLOG-recognised laboratory. The VLOG recognised laboratory must send a test report to the principal for analysis.

Outsourcing
• Outsourcing of tests is permitted under the following conditions:
  – All laboratories involved in GMO testing must be recognised by VLOG.
  – Compliance with the VLOG Standard is to be agreed between the participating laboratories in writing.
  – VLOG-recognised laboratories must document which laboratories they subcontract testing to.
  – Samples are to be milled entirely by a single laboratory, which then sends portions of the milled sample to the participating laboratories.
  – If multiple laboratories participate in the testing, the conclusive evaluation of the sample per Chap. J 3.5 must be performed by a VLOG-recognises laboratory. The VLOG recognised laboratory must send a test report to the principal for analysis.

The VLOG-recognised laboratory (at least the laboratory name) that performs the GMO tests is to be specified on the customer’s test report.

J 3 Methodological Requirements

DIN standards and protocols of the Joint Research Centre (JRC; http://gmocr.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.

J 3.1 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

Explanation: The minimum quantities referred to relate to entire grains and/or beans. For raw materials that exhibit better homogeneity (e.g. soya protein concentrate), smaller weighed portions may be used in coordination with the responsible laboratory.
Maceration:
Depending on the testing matrix, the following minimum quantities of sample material are macerated, respectively:

- Salmon filet: at least 5 g from at least 10 animals, completely macerated
- Salmon products: at least 50 g, completely macerated

DNA extraction:
At least 2 DNA extractions are performed on each sample following milling/maceration/homogenisation. The required weight is at least 2000 mg for feed, seeds, salmon and salmon products and materials that are suspected of not being homogeneously distributed.

Explanation: In exceptional cases (for otherwise non-extractable material), the weight may be only 500 mg.

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).

J 3.2 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 systematic errors, instability of reagents etc., methods for regularly carrying out and documenting QC measures must be established and implemented (e.g. control charts).

J 3.3 Approval of Test Results

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

J 3.4 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 takes 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).
  – Indicating the pLOQ is recommended.

J 3.5 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 tested parameter.

The use of the standard deviation is mandatory for the evaluation in order to account for the inhomogeneous distribution of GMOs in feed or food: in keeping with Regulation (EU) No. 691/2013\(^\text{19}\) as well as the Guideline for Estimation of Measurement Uncertainty published by the German National Accreditation Body (71 SD 4 016)\(^\text{20}\), 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).

Requirements for the Test Scope

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

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\(^{20}\) Guideline on Estimation of Measurement Uncertainty in accordance with the requirements of DIN EN ISO/IEC 17025 for testing laboratories performing chemical analysis in the areas of health protection of consumers, agriculture, chemistry and environment (71 SD 4 016, Revision 1.0, 19 January 2017)
Glossary – Definition of Terms

The following definitions and abbreviations are provided for simplification:

**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).

**Animal production**: The production or rearing of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.

**Animal transport**: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. A business exclusively providing animal transport only possesses the animals.

**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 sites/operating units.

**Certifier**: Personnel 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 Section 3, EGGenT DurchfG used in the production of feed or food products.

**Compound feed**: Compound feed 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.

**Conventional quality, products and raw materials**: Not usable in the “ohne Gentechnik” process.

**Conversion of single-component feeds to “VLOG geprüft” quality**: Through incorporation into

- the VLOG certification,
- a business’ internal risk management 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 root 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.

**Drop shipping**: Drop shipping refers to the trading method wherein the goods are transported directly from the supplier 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.
**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) must 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.

**Facility:** Legally independent businesses with one or several sites.

**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, handling, transportation or distribution of feed, including manufacturers 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 production/processing:** All process steps that include feed processing, e.g. the production of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc. Also includes Private Labelling.

**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.

**Food preparation:** 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 as well as slaughter of animals.

**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).

**GMO:** Genetically modified organisms. According to EU Directive 2001/18/EC 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 contractually integrated into a VLOG group.

**Group organiser:** Business in a VLOG group that organises the certification of the group and holds responsibility for a risk management system that includes the agricultural group members or retail group members.
Handling: 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).

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 which has a critical effect on “ohne Gentechnik”/ “VLOG geprüft” labelling in case of non-compliance.

Last living organism: The last organism that is able to pass on its genetic information.

Livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. As opposed to the animal transporter, a livestock trader owns the animals and may also take possession of the animals if applicable.

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

Lot: See batch.

Matrix member: Business which is contractually integrated into a VLOG matrix.

Matrix organiser: Business in a VLOG matrix that organises the certification of the matrix and holds responsibility for a risk management system that includes all matrix sites.

Matrix site: A site that is contractually integrated into a VLOG matrix via a matrix member.

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

Mobile Grinding and Mixing Facilities: Facilities used commercially and for multiple operations; classified as a feed business (see Part C).

Non-compliant feed, animals, raw materials, products: do not meet the specifications of the VLOG Standard.

Non-VLOG animals: Animals not certified in accordance with the VLOG Standard.

“Ohne Gentechnik” quality, products and raw materials: Usable in the “ohne Gentechnik” process (meets the requirements of EGGenTDurchfG and the VLOG Standard).

Operating unit: Parts of an agricultural operation 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.

Other substances within the meaning of Section 3a (5), EGGenTDurchfG: Substances in accordance with Regulation (EU) No. 1169/2011, Article 20.

Outsourcing: Outsourcing takes place if the outsourcing laboratory is not accredited for the parameter.

Plant-based production: The cultivation of primary products, including harvesting and foraging.

Positive test result: Any test result that confirms the presence of GMOs. That does not automatically mean that the feed, raw material or product cannot be used in “VLOG geprüft” or “ohne Gentechnik” production. The applicable limit values and conditions of EU Regulations 1829/2003 and 1830/2003 and EGGenTDurchfG must be followed for this classification (see Chapters A 1.3.1 and A 1.3.2).

Private Labelling: A business that sells feed manufactured by another business under its own brand or business name as “VLOG geprüft” is practicing private labelling. The feed is either manufactured by
another business on contract in accordance with the Private Labeller’s specifications or the goods are purchased from the manufacturer and sold in the Private Labeller’s name.

**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).

**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).

**Products (food):** All substances or products that are intended for, or which in reasonable discretion can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

**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 consumers, 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.

**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 (see Chapter C 3.3).
- For the Agricultural Stage, Chapter E 4.9.1.1 defines risk-prone feed.

**Shipping company:** See Transporter.

**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:** A site is defined as all premises and buildings of a business at a given postal address. Examples of an address are “Bahnhofstrasse 3a” or “Wiesengrund 1-5”.

**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 production 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.

**Stationary Grinding and Mixing Facilities:** Facilities existing in the operation and used exclusively within the operation.
Storage: The service of temporary storage of food and/or feed on behalf of a third party or storage in one’s own external warehouses.

Subcontracting: Subcontracting means that the laboratory itself is accredited for this parameter, but due to special circumstances such as a lack of laboratory employees or resources, it assigns this parameter to another laboratory accredited for said parameter.

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.

Supplier: The business from which the goods are bought. This can be, for example, the manufacturer or dealer.

Swappable or non-swappable GM feed/raw materials: GM feeds are swappable if their use, by their nature, would also be feasible 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 “ohne Gentechnik” milk production.

Trading: 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. In contrast to drop shipping, the trader takes possession of the goods and owns the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).

Transport: Transport means conveying goods from one place to another.

Transporter: A business that transports goods from one location to another. The goods do not have to be the property of the transporter/shipping company.

“VLOG geprüft” quality: Quality of a feed that is certified in accordance with the VLOG Standard.

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

“VLOG” raw materials, products: Raw materials and products that are certified in accordance with the VLOG Standard and can be used in the “ohne Gentechnik” process.

VLOG Standard: “Ohne Gentechnik” Production and Certification Standard as amended from time to time.

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 Standard issued by a certification body recognised by VLOG.
Annexes

Part 1 Suppliers’ Declarations
I. GMO-Free Certificate According
II. Certificate for “ohne Gentechnik” Compliant Feeding of Animals

Part 2 Analytics
III. Sampling Log
IV. Requirements for the Scope of Test
V. Dealing with Positive Test Results (feed)
VI. Dealing with Positive Test Results (food)
VII. Reduction of the Scope of Testing after Changing Feed in Group Organisations

Part 3 Certification
VIII. VLOG Group Certification Process at the Agriculture Stage
IX. VLOG Matrix and Certification Process
X. Sanctions Catalogue
XI. VLOG Certificate Template
XII. Areas of Application of VLOG Certification

Part 4 Audit Documents
XIII. Facility Description Logistics
XIV. Checklist Logistics
XV. Facility Description Feed Manufacturing
XVI. Checklist Feed Manufacturing
XVII. Facility Description Mobile Grinding and Mixing Facilities
XVIII. Matrix Description and List of Sites
XIX. Checklist Matrix Organisation
XX. Facility Description Agriculture
XXI. Facility Description Animal Transport/ Livestock Trade
XXII. Checklist Agriculture
XXIII. Group Description in Agriculture and Members List
XXIV. Checklist Group Organisation
XXV. Facility Description Food Processing/-Preparation
XXVI. Checklist Food Processing/-Preparation
XXVII. Group Description in Retail and Members List
XXVIII. Checklist Retail – Bulk Goods

Part 5 Protocols and Confirmations
XXIX. Grinding and Mixing Protocol for Mobile Grinding and Mixing Facilities
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. 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) – also available in English

- 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 – available in German only

- 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 – available in German only

- 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/](http://boelw.de/themen/gentechnik/bioxgen/) – available in German only

- 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/](http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/) - available in German only
Data Protection

VLOG undertakes to handle the personal data of its contracting partners carefully and in accordance with the data protection provisions of the German Data Protection Act (DSG) and the General Data Protection Regulation (GDPR). The persons responsible for data processing at VLOG comply with all required technical and organisational measures to ensure data security. Personal data of which VLOG becomes aware in the course of the contractual relationships is processed exclusively in order to discharge this contractual relationship. The following data categories are processed:

- Master data (e.g. name, address, contact information, legal representatives, company domicile)
- Operational data
- Contract data
- Correspondence

VLOG only processes and stores personal data for as long as necessary in order to fulfil the contractual obligations. After the obligations have lapsed, the data is blocked or deleted.

Statutory retention obligations may apply additionally, such as retention obligations under commercial or tax law (e.g. Commercial Code, Tax Code). Insofar as such retention obligations apply, the data is blocked or deleted at the end of these obligatory retention periods.
Producer/Supplier

| Name: ______________________________ | Phone/Fax: ______________________________ |
| Address: __________________________ | Email: ________________________________ |
| Town and postal code: ______________ | Country: ______________________________ |

For the following product and all its ingredients:

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<th>Product number supplier:</th>
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<tbody>
<tr>
<td>Customer’s product number:</td>
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<tr>
<td>Exact product name:</td>
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<tr>
<td>Status/version of the valid product specification*:</td>
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</tbody>
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<table>
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<tr>
<th>Ingredients:</th>
<th>Last living organism(s)**</th>
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* This certificate shall be deemed to form part of the specifications referred to above. The specification mentioned is available for the customer.

** Please indicate the last living organism for all product ingredients that were used in the production process.

We certify that:

(a) The product and the food and food ingredients used to produce it contain no genetically modified organisms (GMOs); they do not consist of GMOs and are not produced from GMOs. Carryovers of GMOs are only tolerated if the GMO is approved in the EU and the detection limit of 0.1% per ingredient is not exceeded. No GMOs were cultivated or released within 10 km of the beehives for apiary products. In the alternative, test results for the batch obtained according to VLOG requirements are available that show no genetic modification.

(b) For ingredients of animal origin we are in the possession of certificates in accordance with the VLOG Standard, the EU Regulation on Organic Production, or another standard recognised as equivalent.

(c) No food, food ingredients, processing aids or other substances within the meaning of Sect. 3a (5) of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) (see Glossary) that are produced by GMOs have been used to prepare, treat, process or mix the food or food ingredients (depth of review: back to the last living organism in the production process). Processing aids and other substances within the meaning of § 3a (5) EGGenTDurchfG have not been used for the aforementioned purposes even if they or their components were labelled as consisting of GMOs, containing GMOs or produced from GMOs in accordance with Regulation (EC) No 1829/2003 or 1830/2003 or, if they had been placed on the market, would have had to be labelled.

We have suitable proof that requirements (a) to (c) were met for all components contained or used in the aforementioned product. Current declarations are on file. We have no evidence that raises doubts regarding compliance with the statutory requirements for the “Ohne Gentechnik” label. We agree to promptly send our customers/buyers and their certification body or licensing body a change notice or correction notice if this declaration is revoked or modified or if facts become known that raise doubts regarding compliance with statutory labelling requirements.
The certification or licensing body responsible for supervising the customer is authorised to verify the correctness of this certification and to take samples for analytical evidence.

We assume liability for the correctness of the statements in this declaration.

____________________________

Name, Position

____________________________

Place/Date Signature Company stamp

Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>EGGenTDurchfG</td>
<td>German EC Genetic Engineering Implementation Act: German act on the implementation of European Community or European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes. The relevant requirements of §§ 3a and 3b of this Act for the ingredients and other substances used are shown in this certificate.</td>
</tr>
<tr>
<td>GMO - “genetically modified organism”</td>
<td>An organism, the genetic material of which has been modified in a way which is not naturally possible by cross-breeding and/or natural recombination, with the exception of organisms in which a genetic modification has been induced by the use of the processes listed in Annex 1B to Directive 2001/18/EC (Article 2(1)(5) of Regulation (EC) No 1829/2003).</td>
</tr>
<tr>
<td>“Produced from GMOs”</td>
<td>Wholly or partly derived from GMOs, but not consisting of or containing GMOs (Article 2(1)(10) of Regulation (EC) No 1829/2003).</td>
</tr>
<tr>
<td>“Produced by GMOs”</td>
<td>Derived by using a GMO as the last living organism in the production process, but not containing or consisting of GMOs nor produced from GMOs (Art. 2 letter v of Regulation (EC) No. 834/2007).</td>
</tr>
<tr>
<td>“Living organism”</td>
<td>Any biological unit capable of reproducing or transferring genetic material (Art. 2 No. 1 of Directive 2001/18/EC, e.g. maize grain; potato). The ability to propagate can be lost, for example, through crushing, drying or heating (e.g. maize starch; potato starch).</td>
</tr>
<tr>
<td>Processing aids</td>
<td>Any substance not consumed as a food ingredient by itself, intentionally used in the processing of raw materials, foods or their ingredients, to fulfil a certain technological purpose during treatment or processing and which may result in the unintentional but technically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the finished product (Art. 2 letter y of Regulation (EC) No. 834/2007).</td>
</tr>
</tbody>
</table>
| “Other substances within the meaning of Sec. 3a (5) of the EGGenTDurchfG” | Substances within the meaning of § 5 para. 2 of the Food Labelling Ordinance (LMKV) as amended in Ordinance of 18th December 2007. This includes:  
  • Components of an ingredient that were temporarily removed during manufacturing and then added back into the food without exceeding their original quantity,  
  • Additives, aromas, enzymes and microorganism cultures that were contained in one or more ingredient of a food, as long as they no longer have a technological effect in the final product,  
  • Solutions and carrier substances for additives, aromas, enzymes and microorganism cultures, as long as they are used only in technologically necessary quantities  
  • Extraction solvents and  
  • Substances used in the same way and for the same purpose as processing aids and which are present in the finished product, even in an altered form. |
| Standard recognised as equivalent | All standards recognized by VLOG as equivalent can be found under the following link: (https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Version_19.01/Standards_recognised_as_equivalent_final_181001.pdf) |
Supplier
Name: ___________________________    Tel./ Fax: ___________________________
Address: ______________________    Email: ________________________________
Town/postal code: ___________________ Country: __________________________

We hereby confirm “ohne Gentechnik” compliant feeding for the following animals/animal groups:

<table>
<thead>
<tr>
<th>Ear tag number/stamp/other information uniquely identifying the animal/animal groups</th>
<th>“ohne Gentechnik” compliant feeding since</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
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</tr>
</tbody>
</table>

☐ For other animals see attachment:  

We have suitable proof that the requirements for “ohne Gentechnik” compliant feeding were met for all the aforementioned animals/animal groups. We agree to promptly send our customers/buyers and their certification body or licensing body a change notice or correction notice if this declaration is revoked or modified or if facts become known that raise doubts regarding the correctness of this certificate.

We hereby authorise the German Association Food without Genetic Engineering (VLOG), to verify the accuracy of this confirmation in on-site inspections within the scope of random sampling or in suspicious cases and to take samples for testing. These inspections may be carried out by third parties on behalf of VLOG.

We assume liability for the correctness of the statements in this declaration.

___________________________________________________________
Name, Position

___________________________________________
Place/Date    Signature    Company stamp

---

1 “ohne Gentechnik” compliant feeding is understood to mean feeding exclusively using feed that does not fall under the labelling obligation pursuant to EU Regulations (EC) Nos. 1829/2003 and 1830/2003. According to those regulations, feed may not be GMOs itself, contain components of GMO or have been produced from GMOs.

2 Please indicate the date from which the animal continuously received “ohne Gentechnik” compliant feed. In case of interruptions, the counting or the minimum feeding conversion period must start over.

3 Please indicate the name of the facility. In addition, please list in the attachment the date of certification, the animal and the date from which the “ohne Gentechnik” compliant feeding started.
Company (notation, i.a. company stamp):  

i.a. Identification number:  

Sampling location, i.a. add sketch:  

Name of the sampler:  

Type of sample:  
☐ feed  
☐ seed  
☐ raw material  

VLOG-certified:  
☐ yes  
☐ no  

Type / description:  

Manufacturer (& possibly production date):  

Lot number or internal number:  

Best-before date (if available):  

Composition*, i.a. add attachments  

* For feed samples from on-farm mixers of feed the mixing protocol with the ingredients and the mixing date shall be enclosed or specified. For purchased feed, seeds and raw materials the label, waybills and i.e. the specification should be attached.

Sample identification (specific numbers):  
The containers shall be labelled with the sample ID, the sampling date and the facility number!

Sample container # 1  

Sample container # 2  

Sample container # 3 (remains in the company)  

Place, date  
Signature company / deputy  
Signature sampler / auditor
It must be noted that, regarding the minimum requirements for the scope of analysis in Chapter J, not all GMOs were taken into account that are authorised in the EU or tolerated for feed within the meaning of EU Regulation No. 619/2011. Furthermore, GMOs not authorised in the EU are not part of the minimum requirements. In the event of an examination of the marketability and proper labelling of a feed, other GMOs would be taken into account (this includes other GMOs authorised in the EU, GMOs tolerated in feeds pursuant to EU Regulation No. 619/2011, and GMOs not authorised in the EU).

In consultation with laboratories, VLOG regularly checks and updates the following minimum requirements in Chapter J concerning the scope of analysis of raw materials and feeds. In the event of developments that other GMOs become relevant (e.g. RASFF reports), VLOG will provide its members and VLOG-certified companies with corresponding analysis requirements/guidelines in a timely manner.

This does not mean, however, that the companies participating in the VLOG system are dispensed from their own due diligence obligations to regularly check and, if necessary, update the scope of analysis.

1. Minimum requirements for raw materials / single component feed

1.1. Minimum requirements for raw soy materials / soy-based single-component feed

**Determination and assessment of the summation value of the most relevant soy GMOs:**

- Quantification of GTS 40-3-2 (RRS-1)
- Quantification of MON89788 (RRS-2)
- Qualitative detection of A2704-12
  
  In the event of positive result for A2704, the quantity of this GMO can, for example, be estimated using the \( \Delta \Delta \text{ct} \) method or similar method ensuring that sufficient quantities of species DNA are present. For values over 0.1%, a quantification must be carried out.

Alternately, the laboratory may work with screening parameters that detect at least the GMOs mentioned. In subsequent identification / quantification of positive findings, at least all GMOs (if corresponding elements are positive) mentioned here must be quantified.

1.2. Minimum requirements for raw corn materials / corn-based single-component feed

1. **Screening for 3SS Promoter (p3SS) and NOS Terminator (tNOS).**

  Other screening elements can be implemented to narrow the corresponding GMO down.

2. **If positive:** Analysis at least for NK603, TC1507, MON810, MON89034 + RRS-1

If using the positive screening parameters, one or more of these GM corn types can be ruled out, then the same number of commercialised GM corn types that come into question must be searched for instead.

Positive screening results must be clarified; if none of the 4 GM corn types are positive, other GM types must be analysed.
3. **Determining the summation value of the corn GMO**
   Identified varieties must be quantified if the estimation of the concentration, when using, for example, the ΔΔct method or another similar method ensuring that sufficient quantities of species DNA are present, leads to values over 0.1%.

RRS-1 positive:
Estimating the soy mass and assessing the amount of soy: Is it a relevant amount or minimal traces? If a botanical contamination containing GMO is determined, an assessment according to the official guideline must take place.

1.3. **Minimum requirements for raw canola materials / canola-based single component feeds**

1. **Triple screening** that detects all relevant GM canola varieties (e.g. tNOS, pat gene (or LibertyLink construct), CTP2-CP4epsp (or pFMV))

2. **ID depending on positive screening results**
   - tNOS positive: at least RRS + bar gene or MS8 / RF3 directly
   - pat gene / LibertyLink positive: at least canola T45
   - CTP2-CP4epsp / pFMV positive: at least GT73

3. **Determining the summation value of GM canola**
   Identified GM canola varieties must be quantified if the estimation of the quantity, when using, for example, the ΔΔct method or another method ensuring that sufficient quantities of species DNA are present, leads to values over 0.1%.

Positive screening results must be clarified.

If no canola GMO is detected, the presence of a botanical contaminant containing GMO with soya or corn GMO must be clarified (estimation and assessment of masses). Is it a relevant quantity or minimal traces? If a botanical contamination containing GMO is determined, an assessment according to the official guideline must take place.

1.4. **Minimum requirements for rice and rice products**

1. **Preparation of laboratory samples:**
   Two subsamples of at least 250 g each are to be created from the laboratory sample sent, and each is to be analysed separately (1 extraction, 2 PCRs per subsample:).

2. **Element-specific screening:**
   p35S + tNOS + cry1Ab/cry1Ac sequence

3. **Design-specific proof:**

---

Identification, by agreement between the company and the laboratory, of GMO events that cause a positive screening result (see 1).

4. **Exclusion of botanical impurities** (GMO carryovers from other plant species) from corn, soy, cotton and (naturally occurring) Cauliflower Mosaic Virus

If the element-specific screening yields a positive result, design-specific proof is to be provided as the next step. In combination with the exclusion of botanical impurities and the Cauliflower Mosaic Virus, an investigation is to be made of whether the sample contains genetically modified rice.

5. **Evaluation of the PCR results:**

If the targeted sequence of genetically modified rice is proven for at least one of the subsamples analysed, this result is to apply to the entire sample and the batch. The batch cannot be marketed in the EU and cannot be labelled with the “Ohne GenTechnik” seal.

1.5. **Minimum requirements for salmon filet and salmon products**

1. **Design-specific proof**

AquAdvantage® Atlantic salmon (Salmo salar).

2. **Evaluation of the PCR results:**

If the targeted sequence of genetically modified salmon is proven for at least one of the subsamples analysed, this result is to apply to the entire sample and the batch. The batch cannot be marketed in the EU and cannot be labelled with the “Ohne GenTechnik” seal.
2. Minimum requirements for compound feed

2.1. Minimum requirements for compound feed containing soya

Determination and assessment of the summation value of the most relevant GMOs:

Soy:

- Quantification of GTS 40-3-2 (RRS-1)
- Quantification of MON89788 (RRS-2)
- Qualitative detection of A2704-12
  In case of positive result for A2704, the quantity of this GMO can, for example, be estimated using the $\Delta$ct method or a similar method ensuring that sufficient quantities of species DNA are present. For values over 0.1%, a post-quantification must be carried out.

In case of limited analysability of the soya ingredient, the practical LOD must be indicated.

For corn ingredient:

Additional qualitative detection of the 3 commercialised corn varieties: NK603, TC1507, MON810

In case of positive result, the quantity of this GMO can, for example, be estimated using the $\Delta$ct method or a similar method ensuring that sufficient quantities of species DNA are present. For values over 0.1%, a post-quantification of the GMOs detected must be carried out.

In the event of limited analysability of the corn ingredient, the practical LOD must be indicated.

For canola ingredient:

Additional qualitative detection of GT73

In case of positive identification, quantification of GT73 must take place if the estimation of the quantity using, for example, the $\Delta$ct method or another similar method ensuring that sufficient quantities of species DNA are present, leads to values over 0.1%.

In case of limited analysability of the canola ingredient, the practical LOD must be indicated.

Alternately, the laboratory may also work with screening parameters that detect at least the GMOs mentioned (soy, canola, corn). In subsequent identification / quantification of positive results, at least all GMOs (if corresponding elements are positive) mentioned here must be identified and, if necessary, quantified.
2.2. Minimum requirements for soy-free compound feed

Determination and assessment of the summation value of the most relevant GMOs:

Estimating the soy mass:

In a first step, the mass of soy in the feed is estimated. For quantities over 0.9%, the quantity of soy GM must be determined (cf. Minimum requirements for feed containing soy) and an assessment according to the official guideline must take place.

For canola ingredient:

Qualitative evidence of canola GT73 + canola MS8 or canola RF3 (or bar gene)

In the event of positive identification, quantification of GMO or GMOs found must take place if the estimation of the quantity when using, for example, the $\Delta\Delta$ct method or another similar method ensuring that sufficient quantities of species DNA are present, leads to values over 0.1%.

In the event of limited analysability of the corn ingredient, the practical LOD must be indicated.

For corn ingredient:

Qualitative evidence of 3 corn varieties used commercially: NK603, TC1507, MON810

In the event of positive identification, quantification of GMO or GMOs found must take place if the estimation of the quantity when using, for example, the $\Delta\Delta$ct method or another similar method ensuring that sufficient quantities of species DNA are present, leads to values over 0.1%.

In the event of limited analysability of the corn ingredient, the practical LOD must be indicated.

Alternately, the laboratory may work with screening parameters that detect at least the GMOs mentioned (soy, canola, corn). In subsequent identification / quantification of positive results, at least all GMOs (if corresponding elements are positive) mentioned here must be identified and, if necessary, quantified.

2.3. Other products / raw materials

The strategies for analysing GMOs in other single-component feeds, raw materials, (food) ingredients, intermediate products or foods must continue to be agreed upon with the commissioned laboratory, taking into account the composition and origin of the products.
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. 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

Evaluation of test results
Stage Feed Manufacturing and Logistics
Stage Agricultural Production and Group Organisation
Stage Food Processing/preparation

Sampling at Feed Manufacturing, Logistics or Agricultural Production

GMO test, possibly including species quantification

Initial result > 0.5 % GMO

Initial result > 0.1 ≤ 0.5 % GMO

Information of the animal feed supplier

Information of those involved (feed producer, feed supplier, agricultural facility and group organizer if applicable)

Test retained sample / loading sample, if needed

Repeat testing / comparison testing by second laboratory, if needed

Assessment, if needed: Is there a botanical contamination that need not be declared (see slide 4h)

Final result > 0.1 ≤ 0.5 % GMO

Final result > 0.5 % GMO

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

Feed not permissible for the „Ohne Gentechnik“ production

Confirmation of the feed supplier available: sampled feed does not need to be labeled

Feed permissible for „Ohne Gentechnik“ production

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

Assessment of the „Ohne Gentechnik“ status of the feed / animals

If needed, banning of available products from being labeled „Ohne Gentechnik“ / used for production at the facility / at the factory / stored at the warehouse

If already delivered to customers as „VLOG gepflükt“ / „Ohne Gentechnik“ informing of customers and the certification body

All test results must be recorded in the risk management (test results & evaluation, causes and measures taken)

Mandatory steps / measures

Optional steps / measures

3 or 0.1% GMO for botanical contamination requiring no GMO declaration

2 no declaration of the feed supplier is required for „VLOG gepflükt“ 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>
<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 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 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.
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 immediate 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>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>□ Single-component feed</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Delivery date</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Batch identification number</td>
<td></td>
</tr>
<tr>
<td>Number of delivery slip., if applicable</td>
<td></td>
</tr>
<tr>
<td>Date of delivery slip, if applicable</td>
<td></td>
</tr>
<tr>
<td>Date sample taken</td>
<td></td>
</tr>
<tr>
<td>Place sample taken</td>
<td></td>
</tr>
<tr>
<td>Unique sample identification (e.g. Sample ID)</td>
<td></td>
</tr>
<tr>
<td>Date of analytical test report</td>
<td></td>
</tr>
<tr>
<td>Species with finding of GMO content (e.g. soy, maize/corn, ...)</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>
<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>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 animal health, 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:

<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>
<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 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>
<tr>
<td>Test result (PCR)*</td>
<td>Species: GMO positive, $&gt;0.1 \leq 0.9%$; exact value: %, of which Event 1 %, Event 2 %</td>
<td></td>
</tr>
<tr>
<td>In the case of compound feed: Species with finding of GMO content declared as compound feed component?</td>
<td>□ Yes: If declared: Quantity of species: %</td>
<td></td>
</tr>
<tr>
<td>Agricultural operation affected, if applicable</td>
<td>□ No: Quantified amount of species: %</td>
<td></td>
</tr>
</tbody>
</table>

* % 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)

<table>
<thead>
<tr>
<th>Feed (exact name)</th>
<th>□ Compound feed</th>
<th>□ Single-component feed</th>
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</thead>
<tbody>
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<table>
<thead>
<tr>
<th>Delivery date</th>
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<table>
<thead>
<tr>
<th>Batch identification number</th>
<th>□</th>
<th>□</th>
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</table>

<table>
<thead>
<tr>
<th>Number of delivery slip, if applicable</th>
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<th>□</th>
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<tr>
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<table>
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<tr>
<th>Date of delivery slip, if applicable</th>
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<tr>
<th>Date sample taken</th>
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<td>□</td>
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<table>
<thead>
<tr>
<th>Place sample taken</th>
<th>□</th>
<th>□</th>
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<tbody>
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</table>

<table>
<thead>
<tr>
<th>Unique sample identification (e.g. Sample ID)</th>
<th>□</th>
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</table>

<table>
<thead>
<tr>
<th>Date of analytical test report</th>
<th>□</th>
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</thead>
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<tr>
<td>□</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Species with finding of GMO content (e.g. soy, maize/corn, …)</th>
<th>□</th>
</tr>
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<tbody>
<tr>
<td>□</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Test result (PCR)*</th>
<th>Species:</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ GMO positive, &gt;0,1 ≤0,9% bzw. &gt;0,9%; exact value: %,</td>
<td></td>
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<tr>
<td>of which Event 1 %</td>
<td></td>
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<tr>
<td>Event 2 %</td>
<td></td>
</tr>
<tr>
<td>Species:</td>
<td></td>
</tr>
<tr>
<td>□ GMO positive, &gt;0,1 ≤0,9% bzw. &gt;0,9%; exact value: %,</td>
<td></td>
</tr>
<tr>
<td>of which Event 1 %</td>
<td></td>
</tr>
<tr>
<td>Event 2 %</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>In the case of compound feed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Yes:</td>
</tr>
<tr>
<td>Species with finding of GMO content declared as compound feed component?</td>
</tr>
<tr>
<td>If declared: Quantity of species: %</td>
</tr>
<tr>
<td>□ No:</td>
</tr>
<tr>
<td>Quantified amount of species: %</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agricultural operation affected, if applicable</th>
<th>□</th>
</tr>
</thead>
<tbody>
<tr>
<td>□</td>
<td></td>
</tr>
</tbody>
</table>

* % 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:

<table>
<thead>
<tr>
<th>Date</th>
<th>Signature and seal of feed supplier</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Evaluation of test results and measures to be taken

For the credibility of “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 food are handled under the VLOG Standard in accordance with the following flow chart.

5 processed products for which the DNA content does not reliably allow a distinction limit of 0.1%

---

mandatory step/measure

---

optional step/measure

All test results must be recorded in the risk management (test results & evaluation, causes, and measures taken).
Diagram of the process for reducing the scope of testing in group certification at the agricultural stage. This flow chart only provides an overview of the certification process. Details can be found in Chapter E 4.9.1.4.
A diagram of the group certification process at the Agriculture Stage. This flow chart only provides a rough idea of the certification process. Details can be found in Chapter F2.
Diagram of the matrix certification process of matrix organisations with matrix sites affiliated by contract. This flow chart only provides an overview of the certification process. Details can be found in Part D.
<table>
<thead>
<tr>
<th>Events in operations that trigger sanctions</th>
<th>Sanction by certification body</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slight deviation (B-evaluation, not fulfilled)</td>
<td>Written notification (not a sanction in the actual sense but a means to avoid future violations)</td>
</tr>
</tbody>
</table>
| Breach of documentation obligations that can endanger the safety of the system (possible evaluation: not fulfilled, risk) | • Stricter registration and reporting obligation  
• Follow-up audit, if necessary  
• Additional sampling and testing, if necessary  
• Certificate issued only after implementation and verification of corrective action by the certification body |
| Non-compliances that endanger “Ohne Gentechnik” food or “VLOG geprüft” feed, e. g., use of conventional raw materials, lack of compliance with minimum conversion periods, no segregation of batches, etc. (possible evaluation: not fulfilled, risk, KO) | • Warning letter  
• Follow-up audit  
• Additional sampling and testing, if necessary  
• When evaluation reveals a risk: Certificate issued only after implementation and verification of corrective action by the certification body  
• When evaluation is KO: revocation of the VLOG certificate within 2 business days |
| Detection of GMOs in a tangibly affected quantity / batch or lot (e. g., a lot in a feed processing plant, etc.) | • Exclusion of non-compliant goods/products from the GMO-free claim  
• Follow-up audit  
• Additional sampling and testing, if necessary |
| Repeated violation of VLOG Standard | • Warning letter  
• Follow-up audit  
• Additional sampling and testing, if necessary  
• Suspension of certification with temporally limited marketing ban on “Ohne Gentechnik” foods or “VLOG geprüft” feeds |
| • Severe violations;  
• Lack of willingness to comply with the guidelines;  
• Misuse of the VLOG certificate for non-certified products/ feed or use in a misleading way;  
• Refusal of follow-up audit, or non-compliant follow-up audit (result) after suspension of certification | Termination of the monitoring contract  
Withdrawal of the VLOG certificate |
CERTIFICATE

The certification body

Sample Certification Body GmbH

When VLOG-Membership: VLOG Membership No.: M-XXXXX or
When VLOG-Recognition: VLOG-Recognition No.: XXXXXX

confirms, pursuant to a recognition agreement with VLOG e.V. and an audit performed on ##.##.####, documented in a report,

that the products/ feed and processes of

Sample Company GmbH & CO. KG

Official Registration No.: VLOG-ID:
Sample Street 1, 10101 Sample City
Germany
At location: [####, if necessary, refer to Annex ####]

operating at the following stages: [Logistics, Feed manufacturing, Matrix Certification, Agriculture, Agricultural Group Organisation, Food processing/preparation, Retail]
- Sub-stage(s): [#### see chapter A 2.1]

for the certification scope of the audit: [#### see chapter A 3.4, with reference to Annex ####]

meet the requirements of the VLOG “Ohne Gentechnik” production and testing standard (Version 19.01, 01.10.2018), based on Sections 3a and 3b of the German EC Genetic Engineering Implementation Act (EGGenTDurchfG).

Explanation: Which logo is used depends on the stage that is certified.

Name of auditor:
Report No.: #######
Certification No.: ####
Certification valid until. ###.##.20##
Date of certificate issued: ###.##.20##

__________________________________________
Place, Date
Name/Certifier’s Signature
The following areas of application of VLOG certification is more closely defined pursuant to Chapter 4.3.1.:

Feed Manufacturing:
- Compound feed (including complete and supplement feed)
  - Floury
  - Mealy
  - Pelleted
  - hydrothermally treated
- Compound feed (including complete and supplement feed), pelleted
- Single component feed
  - Floury
  - Mealy
  - Pelleted
  - hydrothermally treated
- Mineral feed
- Mobile Grinding and Mixing Facilities

Agriculture, animal production:
- Cattle
- Pigs
- Laying hens
- Broiler chickens
- Turkeys
- Ducks
- Geese
- Sheep
- Goats
- Horses
- Rabbits
- Farmed game
- Aquaculture
- Bees
- Camel

Others after consultation with VLOG
## PART 1: FACILITY PARAMETERS

<table>
<thead>
<tr>
<th>Name of Business/ Name of site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address of Business/ Address of site</td>
</tr>
<tr>
<td>Province or other regional administrative entity</td>
</tr>
<tr>
<td>District or other local administrative entity</td>
</tr>
<tr>
<td>Contact Person</td>
</tr>
<tr>
<td>Telephone number</td>
</tr>
<tr>
<td>Email</td>
</tr>
<tr>
<td>Standard usage agreement(^1) with VLOG</td>
</tr>
<tr>
<td>Type and size of the business/ site: Description of the transport types, trade, and/or warehouse</td>
</tr>
<tr>
<td>Storage</td>
</tr>
<tr>
<td>of: Feed</td>
</tr>
<tr>
<td>Current and intended portion (%) / quantity of the “Ohne Gentechnik” / “VLOG geprüft” transport / storage / transfer / trade</td>
</tr>
<tr>
<td>Ratio (%)</td>
</tr>
<tr>
<td>Staff members in the “Ohne Gentechnik” section including their responsibilities; organisational chart</td>
</tr>
<tr>
<td>Other types of certification</td>
</tr>
</tbody>
</table>

---

\(^1\) Until 15 June 2017: Certification Agreement. Not relevant for matrix sites.
PART 2: ORGANISATION OF THE “VLOG GEPRÜFT” ACTIVITY

1. Which sites are integrated into VLOG certification?

☐ See attachment for more

2. Are raw materials and/or feeds present in the business/ at the site which do not meet the requirements for labelling as “Ohne Gentechnik” or “VLOG-geprüft”?  
   ☐ No. (The business has converted fully to “Ohne Gentechnik” or “VLOG-geprüft” or sufficient GMO-free certificates are available for all raw materials and/or feed → proceed to Question 4)  
   ☐ Yes, there are are there raw materials/feeds present in the business, which are a genetically modified organism (GMO) or were produced with, from, or by means of genetically modified organisms (more in Question 3)

3. How are the dual logistics processes (transport, storage, etc.) of “Ohne Gentechnik” foods and/or “VLOG-geprüft” feeds and conventional foods/feeds organised?
   ☐ Temporal segregation
   ☐ Spatial segregation

4. Does the business/ site subcontract activities requiring certification to third parties or does the business/ site subcontract processing steps requiring certification (contract processors)?  
   ☐ No
   ☐ Yes, the following activities are subcontracted to the following businesses (include contact person and contact information):

   ☐ Yes, the following processing steps are subcontracted to the following businesses:

5. The following information must be provided to the certification body / auditor:
   • List of all stored, transported, transferred, and traded raw materials, food and feeds of the “Ohne Gentechnik” and “VLOG-geprüft” section. The list must include, at a minimum, the following information:
     o Exact description of the raw material, food or groups of the feed (e.g. cattle feed, granulated)
     o Record of which GMO documentation is available (e.g. VLOG non-GMO certification, specification, bill of sale, reference to Regulation (EC) 834/2007)
   • List of all suppliers of “Ohne Gentechnik” products and “VLOG-geprüft” feed (products with the “Ohne Gentechnik” or feed with “VLOG-geprüft” seal)

---

2 Not relevant for matrix sites.
PART 3: EVALUATION OF THE BUSINESS

After examination of the facility description and the on-site check, the auditor or examiner recommends grading into a risk category. The certification body undertakes the final grading upon examination of the documents.

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Auditor</th>
<th>Evaluator/Certifier:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Grading:</td>
<td>Grading:</td>
</tr>
<tr>
<td>Signature</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comment/reasons:

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Yearly update of the facility description by the business/ the site within the scope of self-monitoring:
The relevant parts of the facility description were changed, if necessary, and are now up to date.

<table>
<thead>
<tr>
<th>Year of examination</th>
<th>Business/ site</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Examiner (Name, Position)</td>
</tr>
<tr>
<td></td>
<td>Date</td>
</tr>
<tr>
<td></td>
<td>Signature</td>
</tr>
</tbody>
</table>
# Audit Requirements "Ohne Gentechnik" for Logistics Stage

**Date of Audit:**

**Name of Auditor:**

**Responsible certification body:**

**Company:**

**Address with all contact details:**

**Identification Number if available:**

**Type of audit (Initial audit, Expansion audit, Follow-up audit, Audit on suspicion, Routine audit):**

It exists an agreement with the VLOG-recognised certification body and a signed Standard Usage Agreement with VLOG, which are available at the company:

<table>
<thead>
<tr>
<th>No. of Standard</th>
<th>Topic</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>NA</th>
<th>Risk</th>
<th>KO</th>
<th>Evaluation/ Explanations</th>
<th>Corrective Actions (Company)</th>
<th>Responsibilities/ Dates/ Status (Company)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B3</td>
<td>General Requirements for Business</td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>B3.2</td>
<td>Assignment of Responsibilities/Organisational Chart</td>
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<td>No. of</td>
<td>Topic</td>
<td>A</td>
<td>B</td>
<td>C</td>
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<td>Risk</td>
<td>KO</td>
<td>Evaluation/ Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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<td>B</td>
<td>C</td>
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<td>Risk</td>
<td>KO</td>
<td>Evaluation/ Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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<td>Corrective Actions/Ongoing Improvement Process</td>
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<td>Documentation and Retention Period</td>
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<tr>
<td>B4</td>
<td>Specific Requirements for Storage and Handling</td>
<td>Please choose between &quot;relevant&quot; und &quot;not relevant&quot;! - If &quot;not relevant&quot; is selected, nothing may be filled in!</td>
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<td>Incoming Goods Inspection</td>
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<td>Topic</td>
<td>A</td>
<td>B</td>
<td>C</td>
<td>NA</td>
<td>Risk</td>
<td>KO</td>
<td>Evaluation/ Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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<tr>
<td>B5</td>
<td>Specific Requirements for Trade</td>
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<td>Please choose between &quot;relevant&quot; und &quot;not relevant&quot;! - If &quot;not relevant&quot; is selected, nothing may be filled in! relevant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B5.1</td>
<td>Incoming Goods Inspection</td>
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<td>B5.2</td>
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</table>

**Grading**

- Number of A-Criteria: 0
- Number of B-Criteria: 0
- Number of C-Criteria: 0
- Number of NA Criteria: 0
- Number of KO: 0
- Number of Risk: 0
- Sum of points: 0
- Maximum achievable number of points: 180,00
- Number of evaluated criteria: 0
- achieved percentage: nicht bestanden
## PART 1: FACILITY PARAMETERS

<table>
<thead>
<tr>
<th>Name of Business</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Province or other regional administrative entity</td>
<td></td>
</tr>
<tr>
<td>District or other local administrative entity</td>
<td></td>
</tr>
<tr>
<td><strong>Contact Person</strong></td>
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</tr>
<tr>
<td>Telephone number</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td></td>
</tr>
<tr>
<td>Standard usage agreement¹ with VLOG</td>
<td></td>
</tr>
<tr>
<td>If applicable, registration no. (in accordance with Regulation (EC) 183/2005)</td>
<td></td>
</tr>
</tbody>
</table>
| Type and size of the business/of the “Ohne Gentechnik” production | ☐ Production of single-component feed  
☐ Production of compound feed  
☐ Production of mineral feed  
☐ Operation of mobile grinding and mixing facilities |
| Total turnover / throughput and “VLOG geprüft” turnover/throughput |  |
| (Intended) portion/quantity of “VLOG geprüft” production out of the total production (in %) | Ratio (%)  
Quantity (t) |
| Staff members of the “VLOG geprüft” section including their responsibilities; organisational chart |  |
| Other certifications      |  |

¹ Until 15 June 2017: Certification Agreement
PART 2: ORGANISATION OF “VLOG GEPRÜFT” PRODUCTION

1. Which sites are integrated into VLOG certification?

__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________

2. Are feed, technical auxiliary substances, or other production means subject to obligatory labelling present at the site?

☐ No (The business has converted fully to “VLOG geprüft” → go to Question 4)
☐ No (The business has converted fully to “VLOG geprüft” and feed not subject to obligatory labelling → go to Question 4)
☐ Yes (go to Question 3)

3. How is the dual production of “VLOG geprüft” and conventional feed organised?

☐ Temporal segregation
☐ Spatial segregation

4. Does the business subcontract activities requiring certification to third parties, or does the business subcontract processing steps requiring certification (contract processors)?

☐ No
☐ Yes, the following activities are subcontracted to the following businesses (include contact person and contact information):

__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________

☐ See attachment for more: ____________________________

☐ Yes, the following processing steps are subcontracted to the following businesses:

__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________
__________________________________________________________________________________

☐ See attachment for more: ____________________________
PART 3: ADDITIONAL DOCUMENTS TO BE SUBMITTED

5. The following information must be provided to the certification body / auditor:
   • List of all feed, auxiliary substances, and other production means used in “VLOG geprüft” feed. The list must include, at a minimum, the exact description of the feed, auxiliary substances, and/or other production means.
   • Product list of “VLOG geprüft” feed types (including B2B feeds)

Yearly update of the facility description by the business/ the site within the scope of self-monitoring:
The relevant parts of the facility description were changed, if necessary, and are now up to date.

<table>
<thead>
<tr>
<th>Year of examination</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Business/site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Examiner (Name, Position)</td>
</tr>
<tr>
<td>Date</td>
</tr>
<tr>
<td>Signature</td>
</tr>
</tbody>
</table>
### VLOG “Ohne Gentechnik” Production and Certification Standard - Checklist for the Feed Manufacturing Stage

**Date of audit:**

**Duration of audit (time from - to):**

**Auditor:**

**Combination with other standard(s):**

**Responsible certification body:**

**Business:**

**Address with all contact details:**

**Identification number if available:**

**Audit type (initial, expansion, follow-up, on suspicion, routine):**

Agreement with a VLOG-recognised certification body and signed Standard Usage Agreement with VLOG are on file at the business:

**Sampling during audit:**

**Focus of facility inspection:**

**Auditor’s signature:**

**Business’s signature:**

<table>
<thead>
<tr>
<th>No. in Standard</th>
<th>Topic in Standard</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>N/A</th>
<th>Risk</th>
<th>KO</th>
<th>Evaluation/Explanation</th>
<th>Corrective action (business)</th>
<th>Responsibility/ dates/status (business)</th>
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<td>C3</td>
<td>General Requirements for the Feed Manufacturing Stage</td>
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<td>Assignment of Responsibilities/Organisational Chart</td>
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<tr>
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<td>Risk</td>
<td>KO</td>
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</table>

C3.3 Risk Management

C3.4 Commissioning External Service Providers

C3.5 Incoming Goods Inspection

C3.6 Segregation of the Flow of Goods/Exclusion of Commingling

C3.7 Handling of Non-compliant Feed

C3.8 Traceability
<table>
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</table>

**C3.15** Internal Audits

**C4** Specific Requirements for Production

Please select either "relevant" or "not relevant"! – Do not enter any data if selecting "not relevant"!

- **relevant**

**C4.1** Reference Samples

**C4.2** Sampling and Testing

**C4.3** Outgoing Goods Control/Labelling of Bills of Lading

**C6** Specific Requirements for Mobile Grinding and Mixing Facilities

Please select either "relevant" or "not relevant"! – Do not enter any data if selecting "not relevant"!

- **relevant**

**C6.1** Facility Description

**C6.2** Specific Measures Against Technically Avoidable Commingling
<table>
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<th>No. in Standard</th>
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<td>Transportation of Feed or Trading of Feed</td>
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<td>C6.7</td>
<td>Specific Corrective Measures</td>
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**Grading**

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<td>Number of not passed</td>
<td>0</td>
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<tr>
<td>Number of risks</td>
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<tr>
<td>Number of evaluated criteria</td>
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</tr>
<tr>
<td>Achieved percentage</td>
<td>fehlende oder fehlerhafte Eingaben! nicht bestanden</td>
</tr>
</tbody>
</table>
PART 1: FACILITY PARAMETERS

<table>
<thead>
<tr>
<th>Name of Business</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Province/region or other regional administrative entity</td>
<td></td>
</tr>
<tr>
<td>District/county or other local administrative entity</td>
<td></td>
</tr>
<tr>
<td><strong>Contact Person</strong></td>
<td></td>
</tr>
<tr>
<td>Telephone number</td>
<td></td>
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<tr>
<td>Email</td>
<td></td>
</tr>
<tr>
<td>Standard usage agreement(^1) with VLOG dated</td>
<td></td>
</tr>
<tr>
<td>If applicable, registration no. (in accordance with Regulation (EC) 183/2005)</td>
<td></td>
</tr>
<tr>
<td>Type and size of the business/of the &quot;Ohne Gentechnik&quot; production</td>
<td>☐ Operation of mobile grinding and mixing facilities</td>
</tr>
<tr>
<td>(Projected) portion/quantity of “VLOG geprüft” production out of the total production (in %)</td>
<td>Ratio (%)</td>
</tr>
<tr>
<td>Staff members in the “VLOG geprüft” area including their responsibilities; organisational chart</td>
<td></td>
</tr>
<tr>
<td>Other types of certification</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) until 15 June 2017: VLOG Certification Agreement
PART 2: ORGANISATION OF “VLOG GEPRÜFT” PRODUCTION

1. Which mobile grinding and mixing facilities are integrated into the VLOG certification? Please indicate vehicle identification number (VIN) and license plate for each facility.


2. The facilities mentioned in 1. process...

☐ ...exclusively feed not subject to compulsory labelling,
concerns facilities with the following license plate: ____________________________

☐ ...both feed subject to and not subject to compulsory labelling,
concerns facilities with the following license plate: ____________________________

3. Does the business trade feed (oil/fats)?

☐ No

☐ Yes, including

☐ Oils and fats not subject to compulsory labelling

☐ (partially) including oils and fats not subject to compulsory labelling that are of “VLOG geprüft” quality

☐ Oils and fats subject to compulsory labelling

Yearly update of the facility description by the business/ the site within the scope of self-monitoring:
The relevant parts of the facility description were changed, if necessary, and are now up to date.

<table>
<thead>
<tr>
<th>Year of examination</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Business/ site</td>
<td></td>
</tr>
<tr>
<td>Examiner (Name, Position)</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td></td>
</tr>
<tr>
<td>Signature</td>
<td></td>
</tr>
</tbody>
</table>

DATE FACILITY'S SIGNATURE AUDITOR'S SIGNATURE

PAGE 2
The following is an example of a template for a matrix description. A matrix description must be submitted to the certification body at the time of the application. The matrix organiser must inform the certification body of any significant changes concerning the VLOG certification.

**Matrix description of “SaMa GmbH” sample matrix**

**Matrix organiser:**

*SaMa GmbH*

*Sample street 12, 54321 Sample town*

**Responsible for matrix certification:**

*Sam Sample (QM officer of Sample GmbH)*

Phone: 0123 4567 89  
Email: s.sample@samplegmbh.com

**Activities of the matrix members:**

*e.g. The members of the SaMa VLOG matrix are businesses that carry out transportation, storage and feed production in accordance with the VLOG Standard [...].*

*The sites are mainly located in the administrative districts/federal states/countries of [...].*

*Sometimes other activities such as cattle and pig fattening or laying hen husbandry [...] take place at the site; however, these activities are not part of the SaMa VLOG matrix.*

**Contractors, subcontractors and outsourced processes:**

*The following contractors are included in the SaMa group:*

- *Feedmill GmbH, Feedstreet 8, 12345 Sampleville*

  *Contact person:
  
  Contact information:*

  *On behalf of SaMa GmbH [...]*

- *[...]*

**Areas of responsibility of the matrix organiser:**

*e.g. SaMa prepares and monitors the matrix’s sampling and test plan [...] It assigns the sampling within the scope of the VLOG audit by a certification body [...] *

*SaMa regulates the certification and audit process [...] with the certification body. It initiates and monitors corrective measures together with the affected companies [...].*
SaMa assumes the risk management and has a crisis management system that involves the matrix members [...].

SaMa GmbH carries out an internal audit of the sites annually.

[...]

**Basis for the initial and subsequent certifications**

*E.g.* The matrix operates according to the 33% method: 100% of the sites are audited by the matrix organiser; after that the certification body audits at least 33% of the sites. In the following years, the audits by the certification body will take place depending on the scope of applicability.

Or:

The matrix operates according to the 100% method: 100% of the sites are audited by the certification body before they can be added to the matrix. In the following years, the audits by the certification body will take place depending on the scope of applicability.

**Use of several certification bodies**

[If several certification bodies are used, the matrix description must clearly indicate which tasks are to be performed by which certification body.]

*E.g.* Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaMa matrix.

A-cert will audit the matrix organiser and the following part of the matrix [list the sites, the region or another reference list such as the list of sites].

B-cert will audit [see list above]. C-cert will audit [see list above].

B-cert and C-cert must give their audit results to A-cert, which will then issue the VLOG certificate to the matrix. There is an agreement between the certification bodies for the exchange of data.
Below is a template for a list of sites for matrix certification in logistics and feed production. The list of sites must always be kept up to date by the matrix organiser. The matrix organiser must always immediately notify the certification body/bodies of any relevant changes. The following site list or a site list with equivalent content can be used. [The bolded information is mandatory according to the Standard; the remainder is recommended.]

### List of sites of the SaMa GmbH

<table>
<thead>
<tr>
<th>Name/ Site/ Identification/ Number</th>
<th>Business</th>
<th>Address</th>
<th>Contact person and contact information</th>
<th>Scope of applicability for VLOG certification</th>
<th>Risk category (logistics)</th>
<th>Matrix site since</th>
<th>Initial sampling by the matrix organiser (for 33% regulations)</th>
<th>Most recent routine audit/initial audit by the certification body</th>
<th>Responsible certification body</th>
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</thead>
<tbody>
<tr>
<td>Sample Sample site Sample town</td>
<td>Sample GmbH</td>
<td>Sample street 2, 87654 Sample town</td>
<td>Sam Sample, Tel: 0123 45675, <a href="mailto:s.sample@supplier.de">s.sample@supplier.de</a></td>
<td>feed production</td>
<td>-</td>
<td>03 June 2017</td>
<td>14 April 2017</td>
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<td>C-Cert</td>
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<tr>
<td>Transpofix Site Sampleville</td>
<td>Transpofix GmbH</td>
<td>Street 1, 54321 Sampleville</td>
<td>Samuel Sample, Tel: 0987 5676, <a href="mailto:Dairy@supplier.de">Dairy@supplier.de</a></td>
<td>transport, storage</td>
<td>1</td>
<td>05 July 2018</td>
<td>03 July 2018</td>
<td>Has not yet taken place</td>
<td>A-Cert</td>
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</tbody>
</table>

[...]

1 Relevant only if the matrix uses several certification bodies for the VLOG certification
Audit Requirements "Ohne Gentechnik" for Matrix Certification

Date of Audit: ___________________________ Duration of audit (time from-till): ___________________________

Name of Auditor: ___________________________ Combination with other standards: ___________________________

Responsible certification body: ___________________________ Company: ___________________________

Address with all contact details: ___________________________ Identification Number if available: ___________________________

Type of audit (Initial audit, Expansion audit, Follow-up audit, Audit on suspicion, Routine audit): ___________________________

"Ohne Gentechnik" range please insert here or give reference to the added document: ___________________________

Sample taking during audit: ☐✓ ☐✗

Signature of auditor: ___________________________ Signature of company: ___________________________

<table>
<thead>
<tr>
<th>No. of Standard</th>
<th>Topic</th>
<th>Evaluation</th>
<th>Corrective Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>A</td>
<td>B</td>
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<tr>
<td>D 3</td>
<td>General Requirements for Matrix Organisers</td>
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<tr>
<td>D3.1</td>
<td>Matrix Description, Site List, Facility Description</td>
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</tbody>
</table>

Evaluation: 10 points | 5 points | -10 points | NA | 15% of total points | not passed

Corrective Actions: ☐✓ ☐✗
<table>
<thead>
<tr>
<th>No. of Standard</th>
<th>Topic</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>NA</th>
<th>Risk</th>
<th>KO</th>
<th>Evaluation/Explanations</th>
<th>Corrective Actions (Company)</th>
<th>Responsibilities/ Dates/ Status (Company)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>10</td>
<td>5</td>
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<td>-15% of total points</td>
<td>not passed</td>
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<tr>
<td>D3.2</td>
<td>Contractual Binding of the Members</td>
<td>KO</td>
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<td>D3.3</td>
<td>Risk Management</td>
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<tr>
<td>D3.4</td>
<td>Implementation of the Requirements for Sampling and Testing</td>
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<td>D3.5</td>
<td>Staff and Member Training by the Matrix Organiser</td>
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<tr>
<td>D3.6</td>
<td>Handling on Non-compliant Feed, Raw Materials and Products</td>
<td>KO</td>
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<td>D3.7</td>
<td>Complaint Management</td>
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<td>No. of Standard</td>
<td>Topic</td>
<td>A</td>
<td>B</td>
<td>C</td>
<td>NA</td>
<td>Risk</td>
<td>KO</td>
<td>Evaluation/ Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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<td>D3.8</td>
<td>Goods Recall</td>
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<tr>
<td>D3.9</td>
<td>Crisis Management</td>
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<td>D3.10</td>
<td>Corrective Action/ Continuous Improvement Process</td>
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<tr>
<td>D3.11</td>
<td>Documentation and Retention Periods</td>
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<td>D3.12</td>
<td>Internal Audit</td>
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<td><strong>Grading</strong></td>
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<td>Number of C-Criteria</td>
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<td>Number of NA Criteria</td>
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<td>Number of KO</td>
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<td>Number of evaluated criteria achieved percentage</td>
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</tbody>
</table>
# Part 1: Facility Parameters

<table>
<thead>
<tr>
<th>Name of the business, contact person</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Country</td>
<td></td>
</tr>
<tr>
<td>State or other regional administrative entity</td>
<td></td>
</tr>
<tr>
<td>District or other local administrative entity</td>
<td></td>
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<tr>
<td>Telephone Number</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td></td>
</tr>
<tr>
<td>Facility number or other identification</td>
<td></td>
</tr>
<tr>
<td>Type and size of the business / “Ohne Gentechnik” production</td>
<td></td>
</tr>
<tr>
<td>(Intended) portion (%)/quantity of the “Ohne Gentechnik” production</td>
<td>Ratio (%)</td>
</tr>
<tr>
<td>Is the business part of a group certification through an organisational structure or a bundler? Indicate legal name.</td>
<td></td>
</tr>
<tr>
<td>Facilities with a different address/businesses involved in production/cooperation partners (attachment, if necessary)</td>
<td></td>
</tr>
<tr>
<td>Staff members of the “Ohne Gentechnik” section including their responsibilities; organisational chart (attachment, if necessary)</td>
<td></td>
</tr>
<tr>
<td>Other types of certification</td>
<td></td>
</tr>
<tr>
<td>All print numbers for egg farms and KAT number</td>
<td></td>
</tr>
</tbody>
</table>
### PART 2: ANIMAL INVENTORY

Please indicate all animals raised in your facility and classify their feed.

<table>
<thead>
<tr>
<th>Animal species/Animal category</th>
<th>Stable name</th>
<th>Capacity/number</th>
<th>“Ohne Gentechnik” production Yes/ No</th>
<th>Feed</th>
<th>Minimum feeding period ensured**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dairy cows</td>
<td></td>
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<tr>
<td>Heifers/Female calves</td>
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<tr>
<td>Young cattle</td>
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<tr>
<td>Calves</td>
<td></td>
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<tr>
<td>Fattening bulls</td>
<td></td>
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<tr>
<td>Mother cows</td>
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<tr>
<td>Breeding bulls</td>
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<td>Sows with farrows</td>
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<tr>
<td>Gilts</td>
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<tr>
<td>Fattening pigs</td>
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<tr>
<td>Boars</td>
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<tr>
<td>Ewes with offspring</td>
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<tr>
<td>Goats</td>
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<tr>
<td>Laying hens</td>
<td>*</td>
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<tr>
<td>Chicken fattening</td>
<td>*</td>
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<tr>
<td>Turkey fattening</td>
<td>*</td>
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<tr>
<td>Ducks</td>
<td>*</td>
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<tr>
<td>Geese</td>
<td>*</td>
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<tr>
<td>Rabbits</td>
<td></td>
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</tbody>
</table>
**PART 2: ANIMAL INVENTORY**

<table>
<thead>
<tr>
<th>Game</th>
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</thead>
<tbody>
<tr>
<td>Horses</td>
<td></td>
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<tr>
<td>Other animal categories:</td>
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</tbody>
</table>

* Please also specify in which stalls “Ohne Gentechnik” production occurs (e.g. specific stall number and description):

________________________________________________________________________________

________________________________________________________________________________

________________________________________________________________________________
** Comments on the purchase and conversion feeding periods, or the feeding of individual animal categories: Which concrete measures will guarantee compliance with the minimal feeding period? Also note – if needed, separately – for which animal species/animal category there was no purchase of additional animals or whether only converted animals were purchased.
PART 3: FEED LIST

Please indicate all feeds present in the facility. Please keep this overview always updated by listing newly added feeds/suppliers and deleting those no longer used. After the initial assessment, in case of additions/deletions, please always indicate the date as of which the feed was added or is no longer used (variation date). If separate documents, lists or systems are used, then please note their name in the following table.

<table>
<thead>
<tr>
<th>Exact name of the feed</th>
<th>Own production</th>
<th>Purchased from (supplier and address)</th>
<th>Animal species</th>
<th>Proof of absence of GMO in feed or seed</th>
<th>Amendment date</th>
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</table>
PART 4: LIST OF FEED RATIONS FOR THE “OHNE GENTECHNIK” PRODUCTION

Please state the rations for all animal species here as well as the respective life phases that are within the scope of the “Ohne Gentechnik” production. You do not need to enter changes of the amount or content of feed components that occurred during the year. It is, however, important that the feed components per animal species be known and documented and that their origin be clear.

If separate documents, lists or systems are used, then please note their name in the following table.

Animal species/life phase:

<table>
<thead>
<tr>
<th>Feed components</th>
<th>Ratio (approximately, e.g. TM)</th>
<th>Purchased</th>
<th>Own production</th>
</tr>
</thead>
<tbody>
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For purchased feed components (e. g. mineral feed, single component feed, etc.) please indicate the exact product name according to the declaration on the bag tag or product data sheet and include the declaration in the file.

Remarks:

________________________________________________________________________________

________________________________________________________________________________

________________________________________________________________________________

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________________________________________________________________________________
PART 5: CARRYOVER, COMMINGLING AND SWAPPING

1. Is there any genetically modified feed – even for a limited time - on the premises?
   □ No. Please continue with part 5; “Other circumstances…”
   □ Yes, the following feed for the following animal species/animal categories:

<table>
<thead>
<tr>
<th>Animal species/Animal category</th>
<th>Exact name of the feed</th>
</tr>
</thead>
<tbody>
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2. Is there a regular switch between “Ohne Gentechnik” feeding and feeding with feed labelled in accordance with EC Regulations 1829/2003 and 1830/2003 in one operating unit/section?
   □ No
   □ Yes, there is a regular switch in the following sections:

<table>
<thead>
<tr>
<th>Animal species/animal category</th>
<th>Business section/stall</th>
<th>Time of the switch (age of the animal in weeks)</th>
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<tbody>
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3. Is there a stationary grinding and mixing facility on the premises that will be used for dual production?
   □ No
   □ Yes

4. The risk of carryover of genetically modified feed or mixing or interchanging it with feed appropriate for “GMO-free” production is excluded due to the implementation of the following measures. Please describe the precise measures taken and add plans of storage facilities, feed production facilities, transport routes and feeding facilities as well as stalls.

   Delivery:
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PART 5: CARRYOVER, COMMINGLING AND SWAPPING

Filling facilities:

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Storage:

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Mixing:

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Handling (feed wagons, means of transportation, buckets, shovels, etc.):

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PART 5: CARRYOVER, COMMINGLING AND SWAPPING

Feeding (ensuring that the animal species fed GMO-free feed do not receive feed or feed components that are genetically modified):

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Other circumstances that may lead to commingling and swappi

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4. Carryover by the cultivation of genetically modified plants on the farm or its surroundings.

In the case of cultivation on the farm: Are any certificates at hand confirming the seed to be GMO-free? (Not relevant for cultures that must not be cultivated if genetically modified. In this case, please state with N/A)

☐ No  ☐ Yes: __________________________________________________________  ☐ N/A

Are any genetically modified plants cultivated on the farm? (This question is relevant if commercial cultivation of genetically modified plants is authorised in the country where the farm is located.)

☐ No  ☐ Yes: __________________________________________________________
PART 5: CARRYOVER, COMMINGLING AND SWAPPING

Are there, according to an official GMO location register, any cultivation areas of genetically modified plants within 5 km (including field trials; can also be examined by auditor)?

☐ No  ☐ Yes: ________________________________________________________________

If yes: At exactly what distance are these fields located and which measures are taken to exclude carryover:

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PART 6: EXTERNAL SERVICE PROVIDERS

Please indicate all businesses that provide services for your facility in connection with feed and seed for feed, listing them with their exact name and address. Please also record which measures have been taken in order to prevent carryover or mixing.

1. Mobile grinding and compounding facilities

___________________________________________________________________________
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2. Machinery syndicate (please state also services provided)

___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________

3. Desiccation facilities

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___________________________________________________________________________
___________________________________________________________________________
___________________________________________________________________________
PART 6: EXTERNAL SERVICE PROVIDERS

4. Forwarding companies

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

5. Other entities/businesses including machinery/facilities that are used jointly with neighbours and neighbourly help.

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________________________________________________________________________
________________________________________________________________________
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PART 6: EXTERNAL SERVICE PROVIDERS

Please describe the business’ risk-targeted internal sampling and test procedures with regard to GMOs. How is the business’s internal sampling and testing recorded? How is sampling and storage of the retention samples done? Which laboratory is commissioned and what scope of testing is considered?

________________________________________________________________________________
________________________________________________________________________________
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SECTION 8: MARKETING

How is marking for “GMO-free” products organised? Through direct marketing? How are independently marketed products reported annually to the organisational structure, bundlers or VLOG?

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
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PART 6: EXTERNAL SERVICE PROVIDERS

After examination of the facility description and the on-site check, the auditor or examiner recommends grading into a risk category. The certification body undertakes the final grading upon examination of the documents.

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Examiner of the organisational structure/ the bundler (in case of group certification)</th>
<th>Auditor</th>
<th>Evaluator/Certifier:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Recommendation:</td>
<td>Grading:</td>
<td>Grading:</td>
</tr>
<tr>
<td>Signature</td>
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</tbody>
</table>

Comment/reasons:
________________________________________________________________________________
________________________________________________________________________________
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________________________________________________________________________________

Yearly update of the facility description by the business within the scope of self-monitoring:
The relevant parts of the facility description were changed, if necessary, and are now up to date.

<table>
<thead>
<tr>
<th>Year of examination</th>
<th>Business</th>
<th>Examiner (Name, Position)</th>
<th>Date</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>
## PART 1: FACILITY PARAMETERS

<table>
<thead>
<tr>
<th>Name of the business, contact person</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
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<tr>
<td>Country</td>
<td></td>
</tr>
<tr>
<td>Province or other regional administrative entity</td>
<td></td>
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<tr>
<td>District or other local administrative entity</td>
<td></td>
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<tr>
<td>Telephone Number</td>
<td></td>
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<tr>
<td>Email</td>
<td></td>
</tr>
<tr>
<td>VVVO number or other identifier</td>
<td></td>
</tr>
<tr>
<td>Certificate of registration/business registration enclosed</td>
<td></td>
</tr>
<tr>
<td>Type and size of the business / type and volume of the “Ohne Gentechnik” / “VLOG” transport</td>
<td></td>
</tr>
<tr>
<td>(Intended) portion (%)/quantity of the “Ohne Gentechnik”/“VLOG” transport</td>
<td>Ratio (%)</td>
</tr>
<tr>
<td>Facilities with a different address / businesses involved in production / cooperation partners / external service providers (attachment, if necessary)</td>
<td></td>
</tr>
<tr>
<td>Information of transport units, including transport capacities (attachment, if necessary)</td>
<td></td>
</tr>
<tr>
<td>Staff members of the “Ohne Gentechnik” section including their responsibilities; organisational chart (attachment, if necessary)</td>
<td></td>
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<tr>
<td>Other certifications</td>
<td></td>
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</tbody>
</table>
PART 1: FACILITY PARAMETERS

Please enter all animals or categories of animal traded / transported by your business, and specify their “VLOG” status or feed quality.

<table>
<thead>
<tr>
<th>Animal species/Animal category</th>
<th>VLOG animals</th>
<th>Animals of other quality</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Transport / carriage of VLOG animals</td>
<td>Feeding of VLOG animals during transport / carriage</td>
</tr>
<tr>
<td></td>
<td>Feeding of animals of other quality during transport / carriage</td>
<td>With feed labelled as genetically modified</td>
</tr>
<tr>
<td>Cattle</td>
<td></td>
<td></td>
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<tr>
<td>Pigs</td>
<td></td>
<td></td>
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<tr>
<td>Sheep</td>
<td></td>
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<tr>
<td>Goats</td>
<td></td>
<td></td>
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<tr>
<td>Laying hens</td>
<td></td>
<td></td>
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<tr>
<td>Broiler chickens</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rabbits</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Game</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horses</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other animal categories:</td>
<td></td>
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</tbody>
</table>
PART 2: SUPPLIERS

Please enter here all suppliers of “VLOG” animals.
If separate documents, lists or systems are used, then please note their names roof in the following table.

<table>
<thead>
<tr>
<th>Exact description and address of supplier</th>
<th>“VLOG” animals / animal categories transported / traded</th>
<th>VLOG certification of the supplier obtained</th>
<th>Date of change</th>
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</thead>
<tbody>
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</tbody>
</table>
PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING

1. Are “VLOG” animals and animals of other qualities transported simultaneously in a single transport means / transport container, or are “VLOG” animals and animals of other qualities housed simultaneously at interim locations?

☐ No. Please proceed to 2. “Are “VLOG” animals fed during transport / carriage?”
☐ Yes, the following types / categories of animals are transported simultaneously in one means of transport / transport container or housed simultaneously at interim locations; here the following segregation measures are taken:

<table>
<thead>
<tr>
<th>Animal species/Animal category</th>
<th>Transport means/transport container/interim location</th>
<th>Precise description of the measures taken to segregate the different qualities of animals</th>
</tr>
</thead>
<tbody>
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</table>
## PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING

2. Are “VLOG” animals fed during transport / carriage (including while housed at interim locations)?

- [ ] No. Please proceed to Part 5: Current evaluation of business.
- [x] Yes.

### 2.1 FEED LIST

Please record here all feeds for “VLOG” animals present at the business. Please keep this overview always updated by listing newly added feeds/suppliers and deleting those no longer used. After the initial assessment, in case of additions/deletions, please always indicate the date as of when the feed was added or is no longer used (change date). If separate documents, lists or systems are used, please note the name of the proof in the following table.

<table>
<thead>
<tr>
<th>Exact name of the feed</th>
<th>Own production</th>
<th>Purchased from (supplier and address)</th>
<th>Animal species</th>
<th>Proof of no GMO use in feed or seed</th>
<th>Change date</th>
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</table>
## PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING

### 2.1 FEED LIST (continued)

<table>
<thead>
<tr>
<th>Exact name of the feed</th>
<th>Own production</th>
<th>Purchased from (supplier and address)</th>
<th>Animal species</th>
<th>Proof of no GMO use in feed or seed</th>
<th>Change date</th>
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</thead>
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</table>
PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING

2.2 LIST OF RATIONS FOR “VLOG” ANIMALS

Please list below the rations for all “VLOG” animal/animal categories as well as the respective life phases. Changes of the amount or content of feed components that occurred during the year may be ignored. It is, however, important that the feed components per animal species/animal category be known and documented and that their origin be clear. If separate documents, lists or systems are used, then please note the name of the proof in the following table.

Animal species/life phase:

<table>
<thead>
<tr>
<th>Feed component</th>
<th>Percentage (approximately, e.g. TM)</th>
<th>Purchased</th>
<th>Own production</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>

For purchased feed components (e.g. mineral feed, single component feed, etc.) please indicate the exact product name according to the declaration on the bag tag or product data sheet and include the declaration in the file.

Remarks:

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING

2.3 Is there any genetically modified feed – also for a limited time – on the premises?

☐ No. Please continue with Part 5: Current evaluation of business.
☐ Yes, the following feed for the following animal species/animal categories:

<table>
<thead>
<tr>
<th>Animal species/Animal category</th>
<th>Exact name of the feed</th>
</tr>
</thead>
<tbody>
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</table>

The risk of carryover of genetically modified feed or mixing or swapping it with feed appropriate for “GMO-free” production is excluded due to the implementation of the following measures. Please describe the precise measures taken and add plans of storage facilities, feed production facilities, transport routes and feeding facilities as well as stables.

Delivery:
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
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________________________________________________________________________________

Filling facilities:
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________________________________________________________________________________
________________________________________________________________________________
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**PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING**

**Storage:**

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________

**Mixing:**

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________

**Handling (feed wagons, means of transportation, buckets, shovels, etc.):**

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
PART 4: SEGREGATION OF GOODS FLOWS, EXCLUSION OF SWAPPING

Feeding (ensuring that “VLOG” animals do not receive feed or feed components that are genetically modified):

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________

Other circumstances that may lead to commingling and swapping of feeds on the premises, and how they are prevented:

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________
PART 5: CURRENT EVALUATION OF THE BUSINESS

After examination of the facility description and the on-site check, the auditor or examiner recommends grading into a risk category. The certification body undertakes the final grading upon examination of the documents.

<table>
<thead>
<tr>
<th>Auditor</th>
<th>Evaluator/Certifier:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk category</td>
<td>Grading:</td>
</tr>
<tr>
<td>Date</td>
<td>Grading:</td>
</tr>
<tr>
<td>Signature</td>
<td></td>
</tr>
</tbody>
</table>

Comment/reasons:

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________

Yearly update of the facility description by the business within the scope of self-monitoring:
The relevant parts of the facility description were changed, if necessary, and are now up to date.

| Year of examination | |
| Business | |
| Examiner (Name, Position) | |
| Date | |
| Signature | |
Date of Audit: ___________________________ Duration of audit (time from-till): ___________________________
Name of Auditor: ___________________________ Combination with other standards: ___________________________

responsible certification body: ___________________________ company: ___________________________

Adress with all contact details: ___________________________ Identification Number if available: ___________________________

Type of audit (Initial audit, Expansion audit, Follow-up audit, Audit on suspicion, Routine audit): ___________________________

It exists an agreement with the VLOG-recognised certification body and a signed Standard Usage Agreement with VLOG, which are available at the company: □ □

"ohne Gentechnik" range please insert here or give reference to the added documents: ___________________________

Risk Grading of company (Transfer from facility description): ___________________________

Sample taking during audit: □ □ Focus facility inspection: ___________________________

Signature of auditor: ___________________________ Signature of company: ___________________________

<table>
<thead>
<tr>
<th>No. of Standard</th>
<th>Topic</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>NA</th>
<th>Risk</th>
<th>KO</th>
<th>Evaluation/ Explanations</th>
<th>Corrective Actions (Company)</th>
<th>Responsibilities/ Dates/ Status (Company)</th>
</tr>
</thead>
<tbody>
<tr>
<td>E 3</td>
<td>General Requirements</td>
<td>10 points</td>
<td>5 points</td>
<td>10 points</td>
<td>NA</td>
<td>15% of total points</td>
<td>not passed</td>
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<tr>
<td>E3.1</td>
<td>Facility Description</td>
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<tr>
<td>E3.2</td>
<td>Assignment of Responsibilities/Organisational Chart</td>
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<td>Topic</td>
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<td>B</td>
<td>C</td>
<td>NA</td>
<td>Risk</td>
<td>KO</td>
<td>Evaluation/ Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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<td>-15% of total points</td>
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<td>E3.3</td>
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<td>E3.4</td>
<td>Joint Use of Machines, Facilities/External Service Providers</td>
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<tr>
<td>E3.5</td>
<td>Handling of Non-Compliant Feed, Products and Animals</td>
<td>KO</td>
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<td>E3.6</td>
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<td>KO</td>
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<td>No. of Standard</td>
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<td>B</td>
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<td>NA</td>
<td>Risk</td>
<td>KO</td>
<td>Evaluation/ Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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<td>0</td>
<td>NA</td>
<td>0</td>
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<td>E3.11</td>
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<td>0</td>
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<td>NA</td>
<td>0</td>
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<td>-15% of total points</td>
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<td>0</td>
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<td>NA</td>
<td>0</td>
<td>KO</td>
<td>-15% of total points</td>
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<td>B</td>
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<td>Risk</td>
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<td>Evaluation/Explanations</td>
<td>Corrective Actions (Company)</td>
<td>Responsibilities/ Dates/ Status (Company)</td>
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</table>

**Grading**

- Number of A-Criteria: 0
- Number of B-Criteria: 0
- Number of C-Criteria: 0
- Number of NA Criteria: 0
- Number of KO: 0
- Number of Risk: 0
- Sum of points: 0,00
- Maximum achievable number of points: 310,00
- Number of evaluated criteria: 0
- achieved percentage: nicht bestanden

fehlende oder fehlerhafte Eingaben!
The following is a sample template for a group description. A group description must be submitted to the certification body at the time of the application. The group organiser must notify the certification body of any major changes pertaining to VLOG certification.

**Group description of sample group “SaGro GmbH”**

**Group organiser:**

*SaGro GmbH*

*Sample street 12, 54321 Sample town*

**Responsible for group certification:**

*Sam Sample (QM officer of Sample GmbH)*

*Phone: 0123 4567 89  Email: s.sample@samplergmbh.com*

**Activities of group members:**

*Sample text: The members of the SaGro VLOG group are agricultural operations that keep dairy cows and produce raw milk that complies with the requirements of the VLOG Standard [...]. The agricultural operations refrigerate the milk, but do not treat it otherwise. The milk is sold directly to SaGro GmbH. Some smaller quantities of milk are also sold directly from the farm to consumers [...]. The agricultural operations are mainly located in the administrative districts/federal states/countries [...]. Some operations are also engaged in other agricultural activities such as cattle and pig fattening or egg production [...] however, these activities are not part of the SaGro VLOG group.*

**Contractors, subcontractors and outsourced processes:**

*The following contractors are included in the SaGro group:*

- *Transpofix GmbH, Feedstreet 8, 12345 Sampleville*

  *Contact person:*

  *Contact information:*

  *Transpofix GmbH transports the raw milk from members to the dairy plant [...] on behalf of SaGro GmbH. It takes samples, records milk quantities [...]*

- *[...]*

**Areas of responsibility of the group organiser:**

*Sample text: SaGro prepares and monitors the [...] group’s sampling and test plan. It commissions the sampling within the scope of the VLOG audit by the certification body [...]*
SaGro arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective actions together with the affected facilities [...].

SaGro assumes the risk management for the milk production sector and maintains a crisis management system that involves the group members [...].

SaGro GmbH carries out an internal audit of the agricultural operations annually.

[...]

**Basis for initial and subsequent certifications**

Sample text: The group operates according to the 25% method: 100% of the members are audited by the group organiser; after that, the certification body audits 25% of the members. In subsequent years, the audits by the certification body will take place based on risk grading.

Or:

The group operates according to the 100% method: 100% of the members are audited by the certification body before they can be added to the group. In subsequent years, the audits by the certification body will take place based on risk grading.

**Use of multiple certification bodies**

[If multiple certification bodies are used, the group description must clearly indicate which tasks are to be performed by which certification body.]

Sample text: Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaGro group.

A-cert audits the group organiser and the following part of the group [list the agricultural operations, the region or another reference list such as the members list].

Auditing by B-cert [see list above]. Auditing by C-cert [see list above].

B-cert and C-cert must share their audit results with A-cert, which will then issue the VLOG certificate to the group. The certification bodies have entered into a data sharing agreement.
The following is a sample template for a members list the group certification in agriculture. The members list must always be kept up to date by the group organiser. The group organiser has to promptly notify the certification body of any relevant changes. The following site list or a site list with equivalent content can be used. [The information in bold print is mandatory according to the Standard; the remainder is recommended.]

**Members list of SaGro GmbH**

<table>
<thead>
<tr>
<th>Name/business</th>
<th>Address</th>
<th>Contact person and contact information</th>
<th>Risk category</th>
<th>Group member since</th>
<th>Initial sampling by the group organiser (for 25% method)</th>
<th>Most recent routine audit/initial audit by the certification body</th>
<th>Print number</th>
<th>Responsible certification body</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sam Sample</td>
<td>Sample street 2, 87654 Sampletown</td>
<td>Sam Sample, Tel: 0123 45675, <a href="mailto:s.sample@supplier.de">s.sample@supplier.de</a></td>
<td>1</td>
<td>03 June 2017</td>
<td>14 April 2017</td>
<td>23 May 2017</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dairy Samuel</td>
<td>Dairy street 1, 54321 Sampleville</td>
<td>Samuel Sample, Tel: 0987 5676, <a href="mailto:Dairy@supplier.de">Dairy@supplier.de</a></td>
<td>2</td>
<td>05 July 2018</td>
<td>03 July 2018</td>
<td>Has not yet taken place</td>
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</table>

[...]

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1 Only relevant for egg production
2 Only relevant if the groups uses multiple certification bodies for VLOG certification
Audit Requirements "Ohne Gentechnik" for Agricultural Group Organisation

<table>
<thead>
<tr>
<th>No. of Standard</th>
<th>Topic</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>NA</th>
<th>Risk</th>
<th>KO</th>
<th>Evaluation/Explanations</th>
<th>Corrective Actions (Company)</th>
<th>Responsibilities/ Dates/ Status (Company)</th>
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</thead>
<tbody>
<tr>
<td>F3</td>
<td>Requirements for Group Organisation</td>
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<tr>
<td>F3.1</td>
<td>Group Description, Members List and Facility Description</td>
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<tr>
<td>F3.2</td>
<td>Contractual Binding of Group Members</td>
<td>KO</td>
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Date of Audit: ____________________________

Duration of audit (time from-till): ____________________________

Name of Auditor: ____________________________

Combination with other standards: ____________________________

Responsible certification body: ____________________________

Company: ____________________________

Address with all contact details: ____________________________

Identification Number if available: ____________________________

Type of audit (Initial audit, Expansion audit, Follow-up audit, Audit on suspicion, Routine audit): ____________________________

It exists an agreement with the VLOG-recognised certification body and a signed Standard Usage Agreement with VLOG, which are available at the company: □ yes □ no

Sample taking during audit: □ yes □ no

Signature of auditor: ____________________________

Signature of company: ____________________________

<table>
<thead>
<tr>
<th>No. of Standard</th>
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<th>C</th>
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Audit Requirements "Ohne Gentechnik" for Agricultural Group Organisation
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**Grading**

- Number of A-Criteria: 0
- Number of B-Criteria: 0
- Number of C-Criteria: 0
- Number of NA Criteria: 0
- Number of KO: 0
- Number of Risk: 0
- Sum of points: 0
- Maximum achievable number of points: 130.00
- Number of evaluated criteria: 0
- Achieved percentage: nicht bestanden

Audit Requirements "Ohne Gentechnik" for Agricultural Group Organisation 01.10.2018
### PART 3: CURRENT EVALUATION OF THE BUSINESS

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<th>Name of the Business</th>
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<td>Address</td>
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<tr>
<td>Province or other regional administrative entity</td>
<td></td>
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<tr>
<td>District or other local administrative entity</td>
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<tr>
<td><strong>Contact Person</strong></td>
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<tr>
<td>Telephone number</td>
<td></td>
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<tr>
<td>Email</td>
<td></td>
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<tr>
<td>Standard usage agreement(^1) with VLOG</td>
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</tr>
<tr>
<td>Veterinary control number</td>
<td></td>
</tr>
<tr>
<td>Type and size of the business/of the “Ohne Gentechnik” production (Total turnover / throughput and “Ohne Gentechnik” turnover / throughput)</td>
<td></td>
</tr>
<tr>
<td>(Intended) portion/quantity of the “Ohne Gentechnik” production out of the total production (in %)</td>
<td>Ratio (%)</td>
</tr>
<tr>
<td>Staff members of the “Ohne Gentechnik” section including their responsibilities; organisational chart</td>
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</tr>
<tr>
<td>Other certifications</td>
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<tr>
<td>KAT no. (for egg packing facilities)</td>
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</tbody>
</table>

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\(^1\) Until 15 June 2017: Certification Agreement
PART 3: CURRENT EVALUATION OF THE BUSINESS

1. Which sites are integrated into the “Ohne Gentechnik” certification?

2. Are raw materials present in the business that do not meet the requirements for “Ohne Gentechnik” labelling?
   - [ ] No. (The business has converted fully to “Ohne Gentechnik” production or sufficient non-GMO certificates are available for all raw materials → proceed to Question 4)
   - [ ] Yes. (Proceed to Question 3 “dual production”)

3. How is the dual production of “Ohne Gentechnik” and conventional food products organised?
   - [ ] Temporal segregation
   - [ ] Spatial segregation

4. Does the business subcontract activities requiring certification to third parties, or does the business subcontract processing steps requiring certification (contract processors)?
   - [ ] No
   - [ ] Yes, the following activities are subcontracted to the following businesses (include contact person and contact information):

   - [ ] Yes, the following processing steps are subcontracted to the following businesses:

5. The following information must be provided to the certification body / auditor:
   - List all raw materials and other production means (e.g. aromas, enzymes, cultures of microorganisms, additives, auxiliary substances and other food ingredients) that are used in the “Ohne Gentechnik” products. The list must include, at a minimum, the following information:
     - Exact name of the raw material or other production means
     - Record of which GMO documentation is available (e.g. VLOG non-GMO certification, reference to Regulation (EC) 834/2007)
   - List of “Ohne Gentechnik” products (products with the “Ohne Gentechnik” seal, B2B products, specification of print numbers for egg packing facilities)
PART 3: CURRENT EVALUATION OF THE BUSINESS

After examination of the facility description and the on-site check, the auditor or examiner recommends grading into a risk category.
The certification body undertakes the final grading upon examination of the documents.

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Auditor</th>
<th>Grading:</th>
<th>Evaluator/Certifier:</th>
<th>Grading:</th>
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<tbody>
<tr>
<td>Date</td>
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<td>Signature</td>
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</table>

Comment/reasons:

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Yearly update of the facility description by the business within the scope of self-monitoring:
The relevant parts of the facility description were changed, if necessary, and are now up to date.

<table>
<thead>
<tr>
<th>Year of examination</th>
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Business

<table>
<thead>
<tr>
<th>Examiner (Name, Position)</th>
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<td>Date</td>
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<td>Signature</td>
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</table>
### Audit Requirements "Ohne Gentechnik" for Food Processing/Preparation Stage

<table>
<thead>
<tr>
<th>No. of Standard</th>
<th>Topic</th>
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<th>B</th>
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**Grading**

- Number of A-Criteria: 0
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- Number of C-Criteria: 0
- Number of NA Criteria: 0
- Number of KO: 0
- Number of Risk: 0
- Sum of points: 0,00
- Maximum achievable number of points: 180,00
- Number of evaluated criteria: 0
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The following is an example of a template for group description. A group description must be submitted to the certification body at the time of the application. The group organiser must inform the certification body of any significant changes concerning VLOG certification.

**Group description of “SaGroRe GmbH” retail sample group**

**Group organiser:**

*SaGroRe GmbH*

*Sample street 12, 54321 Sample town*

**Responsible for group certification:**

*Sam Sample (QM officer of Sample GmbH)*

Phone: 0123 4567 89 Email: s.sample@samplegmbh.com

**Activities of the group members:**

*Sample text:* The members of the SaGroRe VLOG group are branches of SaGroRe GmbH, where bulk food of animal origin that meets the requirements of the VLOG Standard is sold to consumers over the counter [...].

*The branches further process the bulk food of animal origin. The processing is organised as follows:*

*The branches are mainly located in the administrative districts/federal states/countries of [...].*

**Contractors, subcontractors and outsourced processes:**

*The following contractors are included in the SaGroRe group:*

**Areas of responsibility of the group’s group organiser:**

*Sample text:* SaGroRe is responsible for risk management of the distribution of “VLOG” quality bulk food of animal origin and has a crisis management system into which the group members are integrated [...].

*SaGroRe regulates the certification and audit process [...] with the certification body. It initiates and monitors corrective measures together with the affected companies [...].

*SaGroRe GmbH carries out an internal audit of the branches annually. [...]*

**Basis for the initial and subsequent certifications**

*Sample text:* SaGroRe’s purchasing of “VLOG” food is centrally regulated. Therefore, in addition to the audit of the group organiser, the certification body will carry out random audits annually at 10% of the branches.

*Or:*

*SaGroRe’s purchasing of “VLOG” food is regulated on a decentralised basis. The certification body will carry out audits of the group organiser and 100% of the branches annually.*
Use of several certification bodies

[If several certification bodies are used, the group description must clearly indicate which tasks are to be performed by which certification body.]

Sample text: *Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaGroRe group.*

*A-cert audits the group organiser and the following part of the group [list containing the branches, the region, or another reference list such as the members list].*

*Auditing by B-cert [see list above]. Auditing by C-cert [see list above].*

*B-cert and C-cert give their audit results to A-cert, which will issue the VLOG certificate to the group. An agreement is in place between the certification bodies for the exchange of data.*

Other documents [integrated into the group description or as extra documents]

- **Organisational chart:** Organisational chart of the business incl. responsibilities and a deputy plan to cover for absences for the operating procedure relevant to “ohne Gentechnik”.
- **List of products:** Overview or specifications for bulk “ohne Gentechnik” goods offered by the business, including consideration of re-working
- **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 suppliers:** All authorised suppliers of “ohne Gentechnik” food/ingredients
The following is a template for a members list for group certification in agriculture. The members list must always be kept up to date by the group organiser. The group organiser must always immediately notify the certification body of any relevant changes. The following site list or a site list with equivalent content can be used. [The bolded information is mandatory according to the Standard; the remainder is recommended.]

**List of members/sites of SaGroRe GmbH**

<table>
<thead>
<tr>
<th>Name/Branch</th>
<th>Address</th>
<th>Contact person and contact information</th>
<th>Centralised or decentralised purchase</th>
<th>Group member since</th>
<th>Most recent routine audit/initial audit by the certification body</th>
<th>Responsible certification body¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>SaGroRe Sample town</td>
<td>Sample street 2, 87654 Sample town</td>
<td>Hans Müller, Tel: 0123 45675, <a href="mailto:h.mueller@anbieter.de">h.mueller@anbieter.de</a></td>
<td>centralised</td>
<td></td>
<td>23 May 2017</td>
<td>A-Cert</td>
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<tr>
<td>SaGroRe Sample city</td>
<td>Sample street 1, 54321 Sample city</td>
<td>Max Bauer, Tel: 0987 5676, <a href="mailto:Milchhof@anbieter.de">Milchhof@anbieter.de</a></td>
<td>decentralised</td>
<td></td>
<td>Has not yet taken place</td>
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[...]  

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¹ Relevant only if the groups use several certification bodies for the VLOG certification
Audit Requirements "Ohne Gentechnik" for Retail Stage - Sale of Bulk Goods

Date of Audit: ________________________________

Duration of audit (time from-till): ________________________________

Name of Auditor: ________________________________

Combination with other standards: ________________________________

responsible certification body: ________________________________

company: ________________________________

Adress with all contact details: ________________________________

Identification Number if available: ________________________________

Type of audit (Initial audit, Expansion audit, Follow-up audit, Audit on suspicion, Routine audit): ________________________________

"ohne Gentechnik" range please insert here or give reference to the added document: ________________________________

Sample taking during audit: ☐ ☐

Signature of auditor: ________________________________

Signature of company: ________________________________

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- Number of B-Criteria: 0
- Number of C-Criteria: 0
- Number of NA Criteria: 0
- Number of KO: 0
- Number of Risk: 0
- Sum of points: 0,00
- Maximum achievable number of points: 160,00
- Achieved percentage: nicht bestanden

Audit Requirements "Ohne Gentechnik" for Retail Stage - Sales of Bulk Goods
Agricultural operation, address (company stamp, if applicable):

Operator of the mobile grinding and mixing facility, address (company stamp, if applicable):

Utilised mobile grinding and mixing facilities (licence plate number): ________________________________

Previous feed mixture produced from:

☐ exclusively feeds not subject to compulsory labelling*

☐ (among others) the following feeds subject to compulsory labelling: ________________________________

Measure implemented to prevent carryover of GMO feed:

☐ Removal of residues

☐ Purges, consisting of type and amount: _______________________________________________________

Where does purge batch go? ________________________________________________________________

Feed mixture made for “Ohne Gentechnik” production:

<table>
<thead>
<tr>
<th>Single-component feed</th>
<th>Silo no./ description/storage location</th>
<th>Amount (kg)</th>
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</table>

Total: ________________________________

With the following signature both the agricultural company and the facility operator confirm the accuracy of the above information.

*Feed which according to Regulations (EC) No. 1829/2003 or No. 1830/2003 is not subject to compulsory labelling as “genetically modified”.