

# Auditing and review processes

## 1. Receipt of the certificate - Certification process for individual certifications

### 1.1 Initial audit

The initial certification procedure is as follows:

#### (1) Application

A business that wishes to be considered an authorised user (hereinafter: the “business”) concludes an agreement with the applicant.

In addition, the business must apply for certification by a certification body recognised by the applicant. In the process, the business specifies the desired scope of application for the certification (stage/sub-stage/product group). A written agreement must be concluded between the business and the recognised certification body regarding the performance of neutral audits and the certification.

#### (2) Audit and evaluation

##### (a)

The certification body will audit the business for the first time on the basis of the requirements for the requested scope of application under the respective specifications.

This will be either

- a complete on-site audit (cf. aa)
- a remote audit (cf. bb) or
- a document audit (cf. cc)

of all sites/operating units involved in the activities of the business, which fall within the requested scope of application. The auditor documents the assessment of the requirements and any deviations found; if necessary, a follow-up audit will be conducted.

##### (aa) On-site audit

The on-site audit is divided into introductory meeting, document inspection, facility inspection and final discussion as follows:

Introductory meeting:

- Introduction of the auditor and the persons involved in the audit

- Presentation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule

#### Document inspection:

- Examination of the facility description and verification of risk grading, if applicable
- Examination 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)
- 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)
- Interview of staff
- Sampling as provided for and/or in the case of suspected non-compliance

#### Final discussion:

- Summary of deviations found and preliminary result

#### (bb) Remote audit

In special, exceptional cases (such as a pandemic) in which an on-site audit is not possible, the on-site audit can be replaced with a remote audit. In so doing, all the items of the on-site audit are retained, but the facility inspection can be replaced by a “digital facility inspection” using information and communications technology. Whether a “digital facility inspection” should be conducted is at the discretion of the applicant. The production areas, equipment and production processes included in the business are reviewed by the auditor based on the floor plan of the business. There are no other special features in comparison to an on-site audit.

#### (cc) Document audit

In a document audit, only those documents required for the audit are to be sent to the responsible certification body. This relates to either the documents that are also checked during an on-site audit or to review of the certificate under a standard recognised by the applicant as equivalent and compliance with additional standard requirements.

#### (b)

##### Grading

The auditor checks compliance with the requirements and grades it. The grading criteria are set forth below:

Grading	Description	Points
A	Full compliance with a requirement	10 Points
B	Minor to moderate deviations from the requirement	5 Points

<b>C</b>	Non-compliance or major deviation from the requirement	- 10 points
<b>N.A.</b>	Not applicable	-
<b>KO</b>	Requirements with a critical impact on "Ohne Gentechnik" labelling in case of non-compliance.	Audit not passed

The audit analysis and the certification decision are made on the basis of the following table:

<b>Audit results</b>	<b>Status</b>	<b>Certificate, measures</b>
<ul style="list-style-type: none"> <li>more than 75% of the maximum points</li> <li>no KO grading</li> </ul>	passed	<ul style="list-style-type: none"> <li>Issuance of the certificate or inclusion in the group or matrix</li> </ul>
Only for document audit (expansion certification in agriculture) <ul style="list-style-type: none"> <li>no KO grading</li> <li>"A" grade for the facility</li> <li>description requiremen</li> </ul>		<ul style="list-style-type: none"> <li>Issuance of the certificate or inclusion in the group</li> </ul>
<ul style="list-style-type: none"> <li>less than 75% of the maximum points</li> <li>no KO grading</li> </ul>	not passed	<ul style="list-style-type: none"> <li>Within process of initial certification: No issuance of a certificate or inclusion in a group or matrix</li> <li>Within process of follow-up certification: No issuance of a new certificate (currently valid certificate is not suspended or revoked) or inclusion in a group or matrix remains in place for the time being until the end of the calender year</li> <li>A new routine audit must be performed</li> <li>The certification body must notify the applicant within 2 working days about the failure to pass the audit (does not apply to group or matrix members who did not pass the audits)</li> </ul>
<ul style="list-style-type: none"> <li>one or more KO gradings</li> </ul>	not passed	<ul style="list-style-type: none"> <li>no issuance of a certificate or inclusion in the group or matrix</li> <li>certification body must suspend the current certificate within 2 working days or the group or matrix member must be removed from the list of members or sites</li> <li>the business must implement the required corrective actions before the certificate is re-issued or before it will be added back to the list of members or sites</li> </ul>

Audit results	Status	Certificate, measures
		<ul style="list-style-type: none"> <li>• a new routine audit must be performed. If the sole reason for the KO evaluation was the lack of documentation, a document audit can be performed instead. The decision whether a new routine audit or a document inspection must be performed is the responsibility of the certification body</li> <li>• certification body must notify applicant about the KO grading within 2 working days (does not apply to group or matrix members who did not pass the audits)</li> </ul>

### (3) Certificate Issuance

Following a successful audit, the certification body will issue the business a certificate no later than 8 weeks after the audit. Businesses or facilities undergoing initial certification are authorised to start shipping only after the issuance of the certificate.

### (4) Duration of 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).

The exception to this is individual certification at the agricultural level. In this case, the duration of the certificate is based on the audit interval and lasts at the latest until the end of the year in which the next routine audit is to be carried out. For livestock traders or animal transporters who are certified in parallel according to the QS standard recognised as equivalent, the duration of the certificate is based on the audit interval of the QS inspections and lasts at the latest until the end of the 3rd following year (based on the audit date).

## 1.2 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 application, this is to be assessed within the framework of an expansion audit. Whether a full audit must be performed or only specific requirements need to be checked will be decided by the relevant certification body. The latter will also decide, in consultation with the business, whether the audit of the requirements must be performed on-site or whether an audit of all the relevant documents/records will suffice.

If the requirements were met, the certificate or the scope of application will be amended to include the new product groups, processes, etc. If no complete on-site audit was performed, the amended certificate will expire at the same time as the certificate for the previous routine audit.

## 2. Receipt of the certificate – Certification process for “transport/logistics” matrix certifications

A matrix is defined as an association of different businesses/sites for the purpose of certification. The matrix is organised by a so-called “matrix organiser”, while the participating businesses are referred to as matrix members and their sites as matrix sites.

The prerequisite for certification is:

- Contract between the matrix organiser and a certification body recognised by the applicant
- existing contract between the matrix organiser and the applicant

### (1) Application

The matrix organiser will apply to a certification body recognised by the applicant for matrix certification in accordance with the relevant requirements. In the process, the matrix organiser must establish the basis on which the initial certification and future approvals of additional sites are to be carried out. For this purpose, the matrix organiser can choose between the 33% process and the 100% process. The 33%-process is an initial data collection at the matrix sites by the matrix organiser, combined with audits by the certification body of the matrix organiser, at 100% of manufacturers and 33% of logistics sites. In the 100%-process audits of the matrix organiser and all matrix sites are certified by the certification body.

### (2) Audit

The initial certification based on initial data collection by the matrix organiser (33%-process) is carried out as follows:

The certification body must perform an initial audit of the matrix organiser. The matrix organiser performs the initial collection of data from all sites, i.e. on-site self-monitoring, by demonstrably competent personnel. The matrix organiser thereby verifies the information in the site-related facility descriptions. The initial data collections are to be performed in coordination with certification bodies recognised by the applicant and are formally approved by them. The matrix organiser subsequently forwards all facility descriptions and initial data collections of the individual sites to the certification body. The certification body reviews and evaluates the matrix description of the matrix organiser and the site-related facility descriptions of all matrix sites. 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 manufacturers and at least 33% of logistic sites by means of its own initial audits. The results of the initial audit are compared with the results of the initial data collections, and measures are initiated, if necessary. The certification body decides on the certification and the clearance of the sites for inclusion on the list of sites based on its own audit.

The initial certification based on 100% of the audits performed by the certification body (100% process) is carried out as follows: The certification body must perform an initial audit of the matrix organiser. The matrix organiser forwards facility descriptions for each site to the certification body

recognised by the applicant. The certification body must perform an initial audit of all matrix members. The certification decision is based on these audits.

#### (3) Certificate Issuance:

The certificate will be issued for a “transport/logistics” matrix with the business name of the matrix organiser. The certification body recognised by the applicant can issue the matrix member a certificate stating that it is part of a matrix certification.

#### (4) Period of validity of the 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).

### **3. Receipt of the certificate - Certification process for “agricultural” group certifications**

A group organisation is defined as an association of different businesses/sites for the purpose of certification. The group is organised by a so-called group organiser, and the participating businesses/sites are referred to as group members.

The prerequisite for certification is:

- Contract between the group organiser and a certification body recognised by the applicant
- existing contract between the group organiser and the applicant

#### (1) Application

The group organiser will apply to a certification body recognised by the applicant for group certification in accordance with the relevant requirements. In the process, the group organiser must establish the basis on which the initial certification and future approvals of additional sites are to be carried out. For this purpose, the group organiser can choose between the 25% process and the 100% process. During the 25%-process there is an initial collection of all 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. The group organiser itself is audited by the certification body. During the 100%-process the certification body performs audits of the group organiser and all group members.

#### (2) Audit

The initial certification based on initial data collection by the group organiser (25%-process) is carried out as follows:

The certification body must perform an initial audit of the group organiser. The group organiser employs demonstrably competent personnel to perform initial data collection from 100 % of the group members, i.e. on-site self-monitoring. The group organiser thereby verifies the information in the facility descriptions of the individual group members. The initial data collections are to be performed in coordination with certification bodies recognised by the applicant and are formally approved by them. The group organiser subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories and checklists for each group member. The certification body reviews and evaluates the group description of the group organiser and the facility descriptions of all group members. 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. 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, etc. The certification body compares the results of initial data collection by the group organiser with its own audit results, initiates further actions if necessary and decides on the certification based on its own audit. 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 on this grading.

The initial certification based on 100% audits by the certification body (100% process) is carried out as follows: 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 must perform an initial audit of all group members.

### (3) Evaluation and audit analysis:

On the basis of the audits an audit analysis is carried out (cf. 1.1.2 (b)) and, if applicable, the certification decision is made and a certificate is issued (cf. 3 (3)). The requirements are evaluated by the auditor by means of the grading criteria in 1.1 (b). The audit analysis is carried out by the certification body in accordance with the specifications in 1.1 (d).

### (4) Certificate Issuance:

The certificate will be issued for a group "agriculture" with the business name of the group organiser. The certification body recognised by the applicant can issue the group member a certificate stating that it is part of a group certification. The group organiser is to report changes to the list of members promptly to the certification body.

### (5) Validity period of the 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).

## 4. Receipt of the certificate - Certification process for “retail” group certifications

### (1) Application

The group organiser applies to the certification body for group certification and submits the group description. The group organiser determines the basis on which the initial certification and the future approval of additional group members will be carried out.

### (2) Audit

The certification body conducts one initial audit or routine audit of the group organiser per calendar year and one initial or routine audit of the group members in accordance with the following sample sizes:

- 10% of the group members per calendar year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until sale to the customer must be ensured. These audits are announced.
- 10% of the group members per calendar year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until the service counter must be ensured. These audits are unannounced.
- 100% of the group members if the “Ohne Gentechnik”/“VLOG” food may be purchased locally. These audits are announced.

### (3) Evaluation and audit analysis

The requirements are evaluated by the auditor by means of the grading criteria in 1.1 (b). The audit analysis is carried out by the certification body in accordance with the specifications in 1.1 (b).

### (4) Certificate Issuance:

The certificate will be issued to the group organiser for the “retail/bulk goods” scope of application. 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.

### (5) Validity period of the 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).