Verification and monitoring

1. Recognition process

1.1 Recognition process for certifiers

The certification bodies that collaborate with the applicant and offer and perform the respective certifications, must first undergo a recognition procedure. A list of the certification bodies recognised by the applicant can be viewed on the internet page

https://www.ohnegentechnik.org/en/for-certifiers/recognised-certification-bodies.

1.2 Recognition procedure for testing laboratories

Testing laboratories are accredited under DIN EN ISO/IEC 17025 (in the current version) for all qualitative and quantitative GMO investigations to be carried out in various areas and are recognised by the applicant for the determination of soy mass. The accreditation can be in the form of a flexible accreditation for the entire area or an individual accreditation for each procedure to be carried out. After recognition by the applicant, the laboratory must submit proof of successful participation to the applicant.

A list of the testing laboratories recognised by the applicant can be viewed on the internet page https://www.ohnegentechnik.org/en/for-test-laboratories/recognised-laboratories.

2. Review of certification bodies (third-party review)

With the aid of mandatory audits required to maintain the certificate, compliance with the characteristics is initially ensured by the certification bodies. Furthermore, the certification bodies can likewise audit compliance with the characteristics in the event of suspicious cases:

2.1 Routine audit for renewal or review of certification

(1) Individual certification

Every business itself is responsible for updating and monitoring compliance with the certificate. Due to the time limit for issuing certificates, each business must apply for maintenance of the certification and carry out a routine audit with the certification body as part of the concluded auditing contract. A routine audit is a complete on-site audit or, if certain conditions are met, a remote audit of all sites/operating units involved in the business' activities or a document audit. The requirements are checked by the auditor. If the requirements are met according to the

respective certifications, the business is re-certified. The routine audit is usually announced beforehand.

In the case of individual certification, annual routine audits are performed at the food processing/preparation, logistics and feed production stages. In the case of individual certification at the agricultural level, the audit intervals depend on the risk category identified:

- Businesses in risk category 0 must be audited by the certification body within 3 calendar years (i.e. at the latest in the third year following the last audit).
- Businesses in risk category 1 must be audited by the certification body within 2 calendar years (i.e. at the latest in the second year following the last audit).
- Businesses in risk category 2 must be audited annually by the certification body.

If a follow-up audit takes place earlier than necessary (e.g. already one calendar year earlier), the subsequent routine audits are accordingly also scheduled earlier.

If, however, a business is a member of a group certification for one type of production as well as individually certified for another type of production, the audit interval for the group certification generally applies to all types of production.

(2) Matrix certification

In the case of a matrix re-certification, the matrix organiser is responsible for compliance with the audit dates and implementation of any measures at the sites. There is an annual audit of the matrix organiser by a certification body recognised by the applicant and routine audits of the respective matrix sites in accordance with the audit intervals.

Food production/processing sites must be audited by the certification body on an annual basis. Matrix sites at the logistics stage must be audited by the certification body within three years, i.e., in the third subsequent year at the latest.

(3) “Agricultural” group certification (Class 44 services)

In the case of group certification, the certification body is responsible for and monitors compliance with the audit dates. This is done with the support of the group organiser. The group organiser is responsible for the implementation of the corrective actions by the group members. The certification body is responsible for monitoring the effectiveness of the corrective actions. The certification body is to perform an annual audit of the group organiser and a routine audit of the group members in accordance with the audit intervals resulting from the corresponding risk category. The audit interval commences as of the date the first certificate is issued.

The following audit intervals apply for the respective risk category:

- All group members in Risk Category 0 must be audited by the certification body within 3 years (i.e. at the latest in the third following year of the last audit).
- All group members in Risk Category 1 must be audited by the certification body within 2 years (i.e. at the latest in the second following year of the last audit).
- All group members in Risk Category 2 must be audited annually by the certification body.

If a follow-up audit takes place earlier than necessary (e.g. already one calendar year earlier), the subsequent routine audits are accordingly also scheduled earlier.

(4) "Retail" group certification (Class 35 services)

In the case of group certification, the certification body is responsible for and monitors compliance with the audit dates. This is done with the support of the group organiser. The group organiser is responsible for the implementation of corrective actions for the group members. The certification body is responsible for monitoring the effectiveness of the corrective actions. The certification body is to perform an annual audit of the group organiser and an audit of the group members in accordance with the following sample sizes:

- 10% of the group members per 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 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 group members with possible decentrally purchased "Ohne Gentechnik"/"VLOG" food products. These audits are announced.

2.2 Follow-up audit

If corrective measures are necessary in the audited business, depending on the severity of the deviation or non-compliance, a follow-up audit is carried out to check the implementation and effectiveness of corrective measures. Here, the auditor only checks selected requirements on site. If the follow-up audit is announced, the certification body documents the reasons for the announcement. The certification body chooses the time of the follow-up audit in such a way that the effectiveness of the specified measures can be reviewed.

2.3 Audit on suspicion

The certification bodies and the applicant are authorised to carry out so-called audit on suspicion. An audit on suspicion is a review of the suspicious factors in which only selected criteria are checked during the on-site audit. These audits are usually unannounced. If the audit is announced, the certification body documents the reasons for the announcement.

3. VLOG Integrity Verification Audit

The inspection of the certification body's auditing processes for conformity with the provisions to be complied with is carried out by means of so-called verification audits. The selection of authorised users to be audited is based, among other things, on the risk of GMO commingling or on complaints and suspicious cases, or a certification body/auditor is the focus of the audit. The verification audit is carried out by an auditor. If possible in the respective business of the authorised user, samples of food or food ingredients are also taken during the verification audit, which are analysed for genetically modified organisms at the expense of the applicant in a laboratory recognised by the applicant. The test reports are made available to the authorised user.

In the event of deviations, a corrective action plan is developed and documented with the authorised user within a maximum period of 4 weeks. The authorised user must prove to the applicant in a timely manner that the corrective actions have been implemented. Evidence is then submitted to the certification body recognised by the applicant. The inspections as part of the verification audit can be performed either announced or unannounced.