

## **Appendix III - Special requirements for “Logistics”**

### **A. General Requirements**

#### **I. Facility Description**

The facility description is on file and up-to-date. The certification body is to be promptly informed about major changes pertaining to the VLOG certification.

#### **II. Assignment of Responsibilities / Organisational Chart**

A current organisational chart shows responsibilities and assigned substitute rules.

#### **III. Risk Management (KO)**

##### **1. Risk analysis**

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

The risk analysis at a minimum covers the following points:

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

##### **2. Risk management**

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

#### **IV. Commissioning External Service Providers**

If activities are outsourced to external service providers, the latter must also be integrated into the business’ risk management system. For activities requiring certification in the areas of manufacturing, transport, storage, handling, trade or drop shipping that VLOG-certified businesses outsource to external service providers, an audit or certification of the service provider is to be performed.

## **V. Segregation of Goods Flows / Exclusion of Commingling (KO)**

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

## **VI. Handling of Non-compliant Raw Materials and Products (KO)**

An effective and documented procedure for handling non-compliant raw materials and products must be in place. This includes at a minimum 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 within the procedure are to be defined.

If the business simultaneously handles self-produced “Ohne Gentechnik” products 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. In addition, the responsible employees must be aware of the GMO status of the product at all stages – from acceptance to production to delivery/transport of the products.

## **VII. Inspection of Outgoing Goods/Labelling on Bills of Lading (KO)**

The certified raw materials and products must be clearly labelled on all bills of lading using the wording “VLOG” and/or the “Ohne GenTechnik” seal. 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 raw materials and products that meet the requirements for labelling may be labelled as such.

## **VIII. 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 flow of goods 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.

## **IX. 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.

## **X. 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.

## **XI. Crisis Management (KO)**

A new, documented procedure has been introduced for the management of incidents that may lead to a crisis situation. This includes, in particular, incidents that affect the product quality and legitimacy of "Ohne Gentechnik"/"VLOG" raw materials and products. This procedure must be implemented and at a minimum includes:

- The sequence of measures in an incident
- The assignment of responsibilities, including provisions for substitutes
- Availability (within and after business hours)
- A list of emergency phone numbers
- A provision requiring immediate notification of the VLOG head office, using the VLOG Incident Sheet, of the certifier, affected customers and business partners
- 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 documented.

## **XII. Corrective Action/Continuous Improvement Process**

If non-compliant raw materials or products are identified within the scope of internal audits, external audits or complaint management and/or 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.

## **XIII. Documentation and Retention Period**

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to the "VLOG" transport, handling, drop shipping, trading or "VLOG" storage are to be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the batch/lot plus one year, but not less than two years.

#### **XIV. Staff Training**

All staff members involved in areas of relevance to VLOG certification, including vehicle operators, must be instructed in the requirements of the VLOG-Standard 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.

#### **XV. Internal Audits**

The business must perform at least one internal audit per calendar year, which at least covers all the general and business-specific requirements for the Logistics stage under the Standard. 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 areas.

### **B. Specific Requirements for Storage and Handling**

The bills of lading are to be checked for the “Ohne Gentechnik”/“VLOG” label or “Ohne GenTechnik” seal within the scope of incoming goods inspection (KO).

### **C. Specific Requirements for Trade**

#### **I. Incoming Goods Inspection (KO)**

At goods receiving, it is to be ensured that all “Ohne Gentechnik”/“VLOG” raw materials and products meet the requirements.

Within the scope of the incoming goods inspection of VLOG-certified raw materials and products the following must be done:

- The bills of lading or, in the case of packed goods, the packaging must be checked for the “Ohne Gentechnik”/“VLOG” label or “Ohne GenTechnik” seal.
- The certification of the supplier is to be checked periodically, the minimum being once per calendar year.

A complaint is to be issued to the supplier for an incomplete bill of lading. The raw materials may be marketed as “VLOG” only if this quality has been verifiably confirmed by the VLOG-certified supplier.

#### **II. Sampling and Testing**

Raw materials and products are subject to risk-based sampling and GMO testing in accordance with the following specifications.

##### **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 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 periods of sampling and GMO testing
- determination of the parameters to be tested (see Guideline for Laboratories)
- description of the testing procedure (commissioned laboratory, scope of testing).

The sampling and testing plan is to be implemented according to schedule. Sampling and GMO testing will not be required if the traded raw materials and products cannot be tested for genetic engineering for technical reasons. In this case the sampling and test plan must provide for a risk analysis reaching the conclusion that it is not necessary to sample or analyse any raw materials/products.

## 2. Frequency of Sampling and Testing

The business must carry out at minimum the sampling and testing at the frequency listed in the table per calendar year. All samples to be tested must be processed in a VLOG-recognised laboratory.

List of all bulk raw materials/products handled at the site <sup>1</sup>	bulk „Ohne Gentechnik“ raw materials/products
bulk „Ohne Gentechnik“ raw materials/products	2 x per year
bulk “Ohne Gentechnik” raw materials/products + bulk raw materials/products not subject to mandatory labelling but not “Ohne Gentechnik” compliant	6 x per year
bulk “Ohne Gentechnik” raw materials/products + raw materials/products subject to mandatory labelling	12 x per year

**Table: Minimum sampling + testing at the Trading of Food sub-stage per calendar year**

## 3. Handling of positive test results

Positive test results as well as the affected raw materials and products in the business must be handled in accordance with a procedure specifically developed by VLOG for this purpose.

## D. Specific Requirements for Drop Shipping

When raw materials or products are drop shipped, the supplier’s VLOG certification is to be checked regularly at incoming goods (KO), at least once per calendar year.

---

<sup>1</sup> Tamper-proof packaging of raw materials/products has no influence on the number of tests