Appendix II - Special requirements for food processing/production

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 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 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, 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 food processing, food preparation, transport, storage, handling or trade that VLOG certified businesses commission to external service providers, an audit or certification of the service provider is to be performed.

V. Incoming Goods Inspection (KO)

At goods receiving, it is to be ensured that all "Ohne Gentechnik" raw materials and products meet the requirements. For incomplete bills of lading a complaint is to be issued to the supplier. If no waybills / bills of lading are produced due to the nature of the system (e.g. for milk collection), an unequivocal contractual regulation concerning delivery is to be made.

Incoming goods inspection of animal raw materials/products

A certification according to the VLOG Standard must exist for all raw materials and products of animal origin used [1].

- 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 per calendar year.

Certification under a standard recognised as equivalent by VLOG may be presented as an alternative to VLOG certification.

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

For all raw materials of non-animal origin, the supplier must submit:

- a GMO-Free Certificate according to the VLOG "Ohne Gentechnik" Production and Certification Standard.

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.

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

For all VLOG-certified raw materials and products of non-animal origin:

- 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 per calendar year.

[1] Honey or other apiculture products that are not certified under the VLOG [Association Food without Genetic Engineering] standard or Council Regulation (EC) 834/2007 may be processed into "VLOG" 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.

VI. Segregation of Goods Flows / Exclusion of Commingling and Swapping (KO)

There must be physical and/or temporal segregation of the flow of goods to ensure that at no point raw materials or products that are not suitable for “Ohne Gentechnik”/”VLOG” labelling enter the goods flow for products with the “Ohne Gentechnik”/”VLOG” label or the “Ohne GenTechnik” seal. Interim cleaning must be done where necessary. In addition, all raw materials / semi-finished products / finished products must be clearly and consistently labelled on all process steps.

VII. 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 are to be defined within the procedure.

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. 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.

VIII. 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 or in the case of packed goods, on the packaging, using the wording “VLOG” and/or the “Ohne GenTechnik” seal. It must be clearly evident to which raw materials or products the labelling refers. If no delivery slips / bills of lading are generated due to the specific systems (e.g. for milk collection), a clear contractual stipulation for the delivery must ensure the above-listed labelling.

IX. 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.

X. 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.

XI. 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.

XII. 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/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.

XIII. 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.

XIV. Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to “Ohne Gentechnik”/”VLOG” labelling or labelling with the “Ohne GenTechnik” seal must 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.

XV. Staff Training

All staff members involved in areas of relevance to “VLOG” labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard 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. Trainings are documented regarding their content, participants, training date, training location and instructors.

XI. 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 food processing/production 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 Plant-Based Raw Materials

I. 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.

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, 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 (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 can be reduced if the utilised raw materials and products are not risk-prone and/or cannot be tested for genetic engineering for technical reasons. In this case, a risk analysis must be in place as the basis for developing a sampling and testing plan that includes at least the following criteria for all raw materials/products utilised in “Ohne Gentechnik” production:

- Country of origin of the raw material/product
- GMO cultivation authorisation (globally and in country of origin)
- Cross-contamination
- Testability of the raw material/product
- Commingling and/or carryover during transport, storage and processing

- Certification status of the raw material/product (e.g. VLOG or a standard recognised as equivalent by VLOG)

2. Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in the table annually, at minimum. Based on the risk analysis produced, the business determines the scope for reducing sampling and testing frequency. The certification body reviews and approves the reduction of sampling and testing frequency on the basis of the risk analysis. The respective decision must be documented. In addition, the certification body must notify VLOG of approved reductions and will submit the risk analysis upon which the reduction is based on request by VLOG.

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

Risk grading	**Minimum number of samples and tests of incoming "Ohne Gentechnik" goods per calendar year**[2]
0	2 samples/tests
1	6 samples/tests
2	12 samples/tests

Table: Minimum number of samples/tests of incoming "Ohne Gentechnik" goods 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 .

II. 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. The overview of these requirements is to be updated regularly and extended based on risk:
https://www.ohnegentechnik.org/fileadmin/user_upload/01_unternehmen/e_standards/e1_der_vlog_standard/Further_Documents/Specific_Requirements_for_Risk-Prone_Raw_Materials_-_Ingredients.pdf

III. Specific Requirements for Transport, Storage, Handling and/or Trading

If the business performs activities in the area of transport, storage, handling, trading or drop shipping of food that are subject to the certification obligation, the relevant requirements must be followed.

[2] The number of samples relates to the total quantity of raw materials used in "Ohne Gentechnik" production.