

Appendix VII - Special requirements for “Logistics” matrix certification

I. Matrix Description, Site List, Facility Description

1. Matrix description

The matrix organiser must submit a current matrix description to the certification body when applying for certification. The matrix organiser must promptly notify the certification body of major changes pertaining to the matrix description pertaining to the 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 matrix, including the persons in charge and their contact data
- A list of all areas for which the matrix organiser is responsible
- The persons in charge of the matrix organisation for the matrix organiser, including their contact information
- Information regarding the basis used for the VLOG initial certification and the approval of additional sites in the future (100% or 33%-process).

2. List of sites

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

- Address / clear identification of the site, name of business associated with the site
- 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.

3. 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.

II. Contractual Binding of the Members (KO)

The matrix members/sites are to be bound to the matrix organiser by a contract/declaration of participation. The contract must contain at least the following items:

- Compliance with the VLOG Standard at the corresponding stage

- Specifications and duties under the individual risk management of the matrix
- Member obligation to implement the corrective actions ordered by the matrix organiser by the specified deadlines. The member must sign the agreement or declaration of participation.

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 includes at least:

- Raw materials and products for the “Ohne Gentechnik”/“VLOG” area
- Handling of raw materials and products that meet the requirement 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 relating to 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 have been introduced and implemented for the identified risks based on the risk analysis. There must be a review of the risk management, including a review of the matrix description, e.g. as part of an internal audit, at least once per calendar year.

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 transport, storage, handling, trade or drop shipping that certified businesses outsource to external service providers, an audit or certification of the service provider is to be performed.

V. Implementation of the Requirements for Sampling and Testing

1. Sampling and test plan

The matrix organiser must create a sampling and testing plan for the matrix sites, which defines the risk-based sampling and GMO testing for risk-prone raw materials and products of relevance for processes in the business. The matrix organiser has to 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, must at a minimum contain/define the following:

- A written, documented risk analysis of the utilised/handled at-risk raw materials and products, and the associated definition of the risk-prone raw materials and products 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 (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.

2. 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.

3. Handling of positive test results

In case of positive GMO test results, the matrix organiser must initiate (corrective) measures.

VI. Staff and Member Training by the Matrix Organiser

All staff members of the matrix organiser involved in areas of relevance to VLOG certification must be trained concerning the 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. Trainings are documented regarding their content, participants, training date, training location and instructors. The matrix organiser must communicate all relevant requirements and information on “Ohne Gentechnik” production to the members. Communication of the information is to be documented.

VII. Handling of Non-compliant Raw Materials and Products (KO)

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

- Labelling of affected 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 raw materials and products

- Documentation and analysis of incidents

The responsibilities are to be defined in 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. Furthermore, responsible employees must be aware of the GMO status at all stages, from receiving through production to delivery/transport of the products.

VIII. Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the certification. 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.

IX. Goods Recall

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

X. Crisis Management (KO)

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

XI. Corrective Actions / Ongoing Improvement Process

If internal audits, external audits, or complaint management result in the identification of non-compliant raw materials, products and/or deviations from certification 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 is to be monitored and their effectiveness reviewed within a reasonable time interval. Both are to be documented.

XII. Documentation and Retention Periods

All records are easily legible and authentic. Post factum manipulation is prohibited and impossible. All documents relating to the matrix certification and labelling with the certification mark are to be retained for at least the following period, unless statutory provisions require a longer retention period: five years.

XIII. Internal Audit

The matrix organiser must perform at least one internal audit per calendar year, which at least covers all the general and matrix organiser-specific certification requirements for the Logistics Matrix Organisation 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 areas.