

Appendix VI – Special requirements for “Agriculture” group certification

I. Group Description

The group organiser must submit a current group description to the certification body when applying for certification. The group organiser must promptly notify the certification body of major changes in the group description pertaining to the certification. The group description must contain/provide at least:

- A list of the group members 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 this group, including the persons in charge and their contact data
- A list of all areas for which the group organiser is responsible
- The persons in charge of group certification for the group organiser, including their contact data
- Information regarding the basis used for the initial certification and the approval of additional group members in the future (100%- or 25%-process)

II. Members list

A complete and up-to-date members list must be available. The group organiser must promptly inform the certification body of any changes in the members list. The group organiser must send the current, reduced members list to VLOG between 01 January and 31 March of each calendar year. At the request of VLOG, the group organiser must promptly send the current, reduced members list to VLOG.

III. Stable space overview

Starting in 2023, the group organiser must send a complete stable space overview for group members to the applicant between 01 January to 31 March of each calendar year.

- The first transmission must be made between 01 January and 31 March 2023 – based on the data available from facility descriptions or databases
- Transmissions starting in 2024: The stable space overview for all group members must at least be updated with respect to the stable spaces for group members that underwent an initial or routine audit during the previous year.

IV. Facility Description of the Group Members

The group organiser is responsible for the facility descriptions of the group members and for keeping them up to date. The group organiser must notify the certification body promptly of internal facility changes that affect the certification. The certification body decides whether additional audits must be performed outside the regular intervals. In individual cases – or if there are incidents – anonymised facility descriptions can be disclosed to VLOG following consultation between the group organiser and the certification body.

V. Contractual Binding of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract/participation statement requiring compliance with the VLOG Standard and with the requirements and obligations of the individual group's risk management. By signing the agreement, members undertake to implement any corrective actions and deadlines as instructed by the group organiser. Each group member must sign the declaration of participation/agreement.

The contract or participation statement between the group member and the group organiser must contain a data release statement (only relevant to egg producers) or be supplemented by it. This data release statement is to be signed by the group member (egg producer).

VI. Risk Management (KO)

1. Risk analysis

A documented risk analysis must be submitted for all relevant products, animals, procedures and processes for which the group organiser is responsible. The risk analysis must contain the assessment of risks affecting “Ohne Gentechnik”/“VLOG” labelling or labelling with the “Ohne GenTechnik” seal (analogous to the HACCP concept). The risk analysis must include at least:

- Animals, products, raw materials for the “Ohne Gentechnik” area
- Handling of animals and products that meet the requirements for “Ohne Gentechnik”/“VLOG” labelling or labelling with the “Ohne GenTechnik” seal and those that do not meet the requirements for “Ohne Gentechnik”/“VLOG” labelling or labelling with the “Ohne GenTechnik” seal
- 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 group description, e.g. as part of an internal audit, at least once per year.

VII. 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 certified businesses outsource to external service providers, an audit or certification of the service provider is to be performed.

VIII. Implementation of the Requirements for Sampling and Testing

1. Test Frequency

At minimum, the testing results for each agriculture group member must be submitted within the respective audit interval.

2. Sampling and test plan

The group organiser is responsible for creating the sampling and testing plan for group members, which defines risk-based sampling and GMO testing of feed in the business. The group organiser has to ensure compliance with the sampling and testing plan. The various production/processing technologies of the group members must be taken into account when generating the sampling and testing plan. The sampling and test plan must at a minimum contain/define the following:

- A written documented risk analysis of the risk-prone feed used and, based on this, the determination of the risk-prone feed 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.

3. Evaluation of the analytical data

The group organiser must:

- collect the test results of the group members and evaluate them at least once per year. These evaluations must be conducted for each group member.
- perform a supplier evaluation based on the evaluation results.
- define risk-based measures for the group members as applicable.

4. Disclosure of test results to VLOG

The group organiser must send a full analysis/overview of the test results to VLOG between 01 January and 31 March of each calendar year.

5. Handling of positive test results

In the event of positive GMO test results, the group organiser must initiate (corrective) action.

IX. Training of Staff and Group Members by the Group Organiser

All staff members of the group organiser involved in areas of relevance to VLOG certification are to be trained concerning the requirements of the VLOG-Standard 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, date, location and instructors. The group organiser must transmit to the group members all relevant requirements and information related to “Ohne Gentechnik” production. Communication of the information is to be documented.

X. Handling of Non-compliant Feed, Products and Animals (KO)

The group organiser must establish an effective and documented procedure handling non-compliant feed, products and animals. This includes at a minimum the following steps:

- Labelling of the affected feed, products and animals
- Notification of customers/buyers, suppliers and group member(s)
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, products and animals
- Documentation and analysis of incidents

The responsibilities in 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. Furthermore, responsible employees must be aware of the GMO status of the feed and the conversion status of the individual animals / fattening batches at all stages, from receiving the feed through animal production to delivery/transport of the animal products/animals.

XI. 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 coordinated with the affected group members and initiated for justified complaints and feedback.

XII. Crisis Management (KO)

The group organiser is responsible for the crisis management of the entire VLOG group.

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” 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 / Ongoing Improvement Process

If non-compliant feed, products or animals 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 group organiser, if applicable together with the group members, must 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.

XIV. Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to the group certification and “VLOG” labelling and/or labelling with “Ohne GenTechnik” seal are to be retained for at least the following period, unless statutory provisions require a longer retention period: five years.

XV. Internal Audits

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