

Appendix V – Special requirements for “Retail” group certification

I. Group Description

The group organiser must submit a current group description to the certification body when applying for certification. It must contain/provide at least:

- An organisational chart of the business including details of responsibilities and a deputy plan to cover for absences for the operating procedure relevant to VLOG certification
- An overview of all sites and branches, including any outsourced warehousing or production processes
- Persons in charge of the group certification at the retail group organiser, including the persons' contact information and provisions regarding deputies
- List of products: Overview or specifications, if applicable, for bulk “Ohne Gentechnik” goods offered by the business, including consideration of re-working
- Member list: A list and description of the activities of the retail group members with information about whether the purchase of “Ohne Gentechnik”/“VLOG” food is centralised or decentralised
- Information on whether traceability can be ensured up until sale to the customer or up until the service counter
- 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 (e.g. *risk management, crisis management, etc.*). For further processing of bulk “Ohne Gentechnik”/“VLOG” goods and the use of further ingredients which are not purchased from VLOG certified suppliers (e.g. marinades, mixed spices), a list of all formulations with quantity- or weight-related information on “Ohne Gentechnik” ingredients and components, including consideration of re-working
- List of all authorised suppliers of “Ohne Gentechnik”/“VLOG” food and ingredients

The *retail group description* must be kept up to date by the group organiser. The group organiser must promptly notify certification body of internal changes in the business pertaining to the certification. The current *retail group description* must be available at the retail group organiser and the retail group members. For auditing purposes, the current group description, any additional annexes and any documents listed in the group description must be submitted to the auditor for inspection. The current product and member list must be submitted to the auditor for further processing at the certification body and forwarding to VLOG. At the request of VLOG, the group organiser must promptly send the current list of members to VLOG.

II. Contractual Binding of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract or participation statement requiring at least compliance with the VLOG Standard, the requirements and obligations of the individual group's risk management. The contract or participation statement must be signed by the group member.

III. Risk Management (KO)

1. Risk analysis

A documented risk analysis is to be submitted for all relevant raw materials, products, procedures and processes for which the group organiser is responsible. This must include evaluation of the risks 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 requirements for “Ohne Gentechnik”/“VLOG” labelling, and raw materials and products that do not meet the requirements for “Ohne Gentechnik”/“VLOG” labelling
- Cleaning and disinfection procedure
- Suppliers (certifications, contracts, reliability, etc.)
- Sales/Declaration
- 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 at least once per year.

IV. Procurement (Suppliers and Producer Certification)

A system must be in place for approval of suppliers and articles. The ordering of bulk and packaged goods is to be transparent. In addition, supplier lists, lists of articles and the specifications for bulk “Ohne Gentechnik”/“VLOG” goods must be available. The abrogation of documentation and retention periods for formulations/formulation changes must be approved by a manager at the facility.

V. Incoming Goods Inspection (KO)

At goods receiving, it is to be ensured that all “ohne Gentechnik”/“VLOG” raw materials and products meet the requirements. There must be a documented check of “VLOG” identification on the packaging and delivery slips and/or the invoice and a check whether the supplier is approved; the supplier’s certification must be checked regularly, at least once each calendar year. For non-VLOG-certified raw materials not of animal origin, a certificate must show that they are GMO free.

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

Physical and/or temporal segregation of the goods flows must guarantee that at no time products not suitable for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal not come into contact with the goods flows of products destined for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal. Where necessary, interim cleaning must be performed.

In addition, all raw materials / semi-finished products / finished products must be clearly and consistently labelled on all process steps. This applies, in particular, when goods are sent from the

central office to the individual branches. In this case, “VLOG” goods must be clearly identifiable as such.

VII. Processing

Binding formulations, stating quantities and weights, are to be documented for all self-processed “Ohne Gentechnik”/“VLOG” products. The formulations only contain ingredients that meet the requirements for the production of “Ohne Gentechnik” products in accordance with the VLOG Standard.

VIII. 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, training date, training location and instructors.

The group organiser transmits to the group members all relevant requirements and information related to “Ohne Gentechnik” production. Communication of the information is to be documented.

IX. Handling of Non-compliant Raw Materials/Products (KO)

An effective and documented procedure for handling non-compliant raw materials/products must be in place. This includes at a minimum the following steps:

- Labelling of respective raw materials and products
- Notification of the suppliers and group organiser and/or group member
- 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 in the procedure are to be defined.

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.

X. Labelling

Price tags and/or product labels must bear the mention “Ohne Gentechnik” or the “Ohne GenTechnik” seal.

XI. 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 can be generated within one working day to allow for conclusions about goods flows and their plausibility.

The sale, refinement, write-offs, and inventory adjustments of bulk “Ohne Gentechnik”/“VLOG” products must be documented in the business item by item and with traceable and verifiable quantity information. The labelling system must be defined and clearly recognisable.

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 and products. This procedure is to be implemented, must take into account all branches, and has to comprise, at a minimum:

- 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

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 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 Periods

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to the “Ohne Gentechnik”/“VLOG” labelling are to be retained for at least the following time interval, unless statutory provisions require a longer retention period: two years.

XV. Internal Audits

Each calendar year, the group organiser must perform an internal audit in the business of the group organiser and all branches. At a minimum, this audit must cover all general and business-specific requirements according to the Standard for the Retail 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.

In the scope of the internal audit per calendar year, at least two risk-based random sample checks are to be performed for goods tracing, incl. quantity comparison, and the results are to be documented. Compound food products are also taken into account, if produced by the business or at its branches.

The following additional points are to be checked:

- “Ohne Gentechnik”/“VLOG” labelling in the business
- Update status and implementation of process and work instructions