

Assessment Aid – At Risk Feed

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For “VLOG geprüft” production or labelling, according to Chapter B 7.1 and C 3.3 of the “Ohne Gentechnik” Production and Certification Standard V 20.01, feed businesses are obligated to carry out an individual risk grading of the raw materials/single-component feed used (**at risk/not at risk**). The business is responsible for assessing the feed. The risk grading must be verifiable for the auditor within the scope of the VLOG certification. The operator can follow the assessment points listed here. If he deviates from these points, then plausible assessment steps must be derived.

Note: The assessment aid refers to the implemented processed or unprocessed raw materials/single-component feed.

Steps for the risk assessment of feeds (suggestion):

1. Checking the documentation
2. Assessing the origin of the raw materials
3. Considering the packaging, transportation, storage and processing

Regarding 1. “Checking the documentation”

Based on the documents available at the business, a first classification of the feed can take place. In so doing, the following questions can be clarified (examples):

- Is the declaration without a GMO label (“not subject to compulsory GMO labelling”)?
- Does the supplier have an additional certification/feed certification (e.g. “feed can be used for “Ohne Gentechnik” production of food”)?
- Does it follow from the product data sheet that the product is not subject to compulsory GMO labelling?
- Do contractual provisions regulate the fact that the product is not subject to compulsory GMO labelling?
- Are there certification documents from the supplier (e.g. VLOG certificate)?
- Is there proof of a supplier audit?
- Are there test results (pursuant to VLOG Standard Annex IV “Requirements for the Scope of the Test) from an accredited lab (with/without clear reference to the party)?

Regarding 2. “Assessing the origin of the feed”

Feed from countries in which growing genetically modified plants is allowed can pose a risk. Therefore, it is important for the feed business to know the origin of the single component feed (or the raw materials for it).

Based on the information from:

- the EU Commission for the exclusion of growing genetically modified plants (https://ec.europa.eu/food/plant/gmo/authorisation/cultivation/geographical_scope_en);
- the Forum Bio- und Gentechnologie e. V. (www.transgen.de);
- the Donau Soja Association (www.donausoja.org); and
- industry experts

the following table provides an overview of where growing genetically modified plants is allowed and thus possible at-risk feed origin:

| As of 20 February 2018 | Types of genetically modified plants known | Growing specific genetically modified plants is allowed | Growing (specific) genetically modified plants is prohibited |
|-------------------------|---|---|--|
| Soy | North, Middle and South America Ukraine China South Africa Romania | Moldova | European Union |
| Canola/Rape seed | North, Middle and South America Australia | | European Union |
| Corn | Portugal Spain Slovakia North, Middle and South America Ukraine | United Kingdom (except Northern Ireland, Scotland, Wales) Estonia Romania Czech Republic Finland Sweden Ireland Bulgaria | Remaining countries (regions) in the European Union |
| Sugar beet | North America | | European Union |

Note: This table is not intended to be an exhaustive list. It will be updated as necessary.

Regarding 3. "Considering the packaging, transportation, storage and processing"

Other critical points will be clarified using the following questions (choice):

- Is the product in question transported by your own or external feed businesses? Is the transporter (VLOG) certified? Is there an agreement regarding cleaning the transportation vehicles?
- Is the product in question stored/handled by (VLOG-)certified feed businesses?
- Was the product in question processed in any way by (VLOG-)certified feed businesses?

Note: If during the assessment of the feed, the operator comes to the conclusion that it is "at risk" then the goods receiving is to be sampled in lots (cf. V 20.01 Chapter B 7.2 or C 4.2).