

Assessment Aid – At Risk Feed

For “VLOG geprüft” production or labelling, feed manufacturers in accordance with Chapter 2.4 and dropshippers/traders who convert feed to “VLOG geprüft” in accordance with Chapter B 6.1 of the current “Ohne Gentechnik” Production and Certification Standard are obliged to carry out an individual risk grading of feed in the area of “VLOG geprüft” (**at risk/not at risk**). The business is responsible for the assessment of 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 implemented processed or unprocessed raw material/single-component feed.

Steps for the risk assessment of feeds (suggestion):

1. Checking the documentation
2. Assessing the origin of the raw materials/single-component feed
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, ProTerra, DonauSoya or Standards recognised as equivalent by VLOG)?
- Is there proof of a supplier audit?
- Are there test results (pursuant to [Guideline for test laboratories](#)) 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 business to know the origin of the feed (or the raw material 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: 01.04.2022	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 South Africa Ukraine Romania	China Moldova	Remaining countries in the European Union Serbia India
Canola/ Rapeseed	North, Middle and South America Australia		European Union
Corn	Portugal Spain Ukraine North, Middle and South America	United Kingdom (England) Ireland Belgium (Flemish Region) Estonia Romania Czech Republic Slovakia Finland Sweden	United Kingdom (Northern Ireland, Scotland, Wales) Belgium (Walloon Region) Remaining countries & regions in the European Union
Sugar beet	North America		European Union

Since different labeling regulations apply to countries outside the EU, random GMO monitoring should be carried out for goods from these countries, even if the country itself is not classified as a risk country for cultivation.

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 business comes to the conclusion that it is "at risk" then it must be sampled and tested batch by batch on the incoming goods (cf. Chapter C 3.1.3/B 6.3 of the "Ohne Gentechnik" Production and Certification Standard).