

Certification Obligation under the VLOG Standard commencing 01/2021

Dear Sir/Madam:

The market for “ohne GenTechnik” food has been expanding for years and is now almost as large as the market for organic food. Meat products in marinated and seasoned form, and milk and dairy products constitute a large segment of the products that bear the “Ohne GenTechnik” seal.

A few years ago, the “Ohne GenTechnik” seal was only placed on meat and dairy products that contained marinades and spice mixtures made solely from plant-based ingredients. Therefore, VLOG initially decided against a certification obligation for marinades and spice mixtures and made its own checks to ensure that the ingredients and contents conformed to the EC Genetic Engineering Implementation Act (EGGenTDurchfG) and the VLOG Standard. The respective marinades, etc., were also checked by the competent certification body during VLOG audits of licensees.

Since then, numerous marinated/seasoned meat products and milk and dairy products bearing the “Ohne GenTechnik” seal have appeared in the market. Marinades, spice mixtures, fillings, sauces, etc., that also contain ingredients and additives of animal origin are in increasing use. Before issuing a licence to use the “Ohne GenTechnik” seal for these foods, VLOG checks new marinades, spice mixtures, fillings, sauces, etc., as it does with plant-based ingredients, utilising risk-based document reviews to ensure compliance with the VLOG Standard. This entails a considerable effort by the VLOG head office and the licensee as well.

Since 2018, the VLOG Standard has included a certification obligation for the processing and preparation of products of animal origin bearing the “VLOG” name or are labelled with the “Ohne GenTechnik” seal, up to the stage of packaging for consumer use. Spices and marinades were excluded from this obligation because, as noted above, the proportion of ingredients of animal origin has generally been extremely low or non-existent. Due to the (recent) increase in the use of ingredients and additives of animal origin in marinades, spice mixtures, fillings, sauces, etc., VLOG currently considers that the extension and enforcement of this certification obligation to manufacturers of these products is essential to ensure the credibility of the “Ohne GenTechnik” seal and the VLOG Standard.

Therefore, the certification obligation will be expanded to include marinade manufacturers in the future. Their products can be certified in accordance with the VLOG Standard or another standard recognised as equivalent¹.

This means the following for your business as a manufacturer of marinades, spice mixtures, fillings, sauces, etc., bearing the “Ohne GenTechnik” seal:

Commencing on 01 January 2021, your business must be certified in accordance with the VLOG Standard or a standard recognised as equivalent if you wish to continue marketing marinades, spice mixtures, fillings, sauces, etc., with ingredients and additives of animal origin to VLOG-certified processors.

¹ A current overview of standards recognised as equivalent by VLOG can be found [here](#).

If you have already been audited in 2020 and are unable to combine this certification with other certifications, please contact us no later than 30 September 2020.

All the necessary information regarding VLOG certification can be found in the attached information packet.

In addition to this letter, VLOG will send personal letters to inform all VLOG processors and licensees for marinated/seasoned food about their company's certification obligation, which commences on 01 January 2021, and will utilise the VLOG newsletter to inform all VLOG members and certified businesses of this.

Please contact us with any questions regarding the certification obligation. Your contact persons for this purpose are:

- Ms. Christin Käbe (Tel.: +49 30 235 9945 22, c.kaebe@ohnegentechnik.org) and
- Ms. Carmen Brzoska (Tel.: +49 30 235 9945 21, c.brzoska@ohnegentechnik.org).