

“Ohne Gentechnik” Production and Certification Standard

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A 1 Introduction

The German EC Genetic Engineering Implementation Act (EGGenTDurchfG) has been in force since May 2008. It governs the labelling of food which has been produced without the "use of genetic engineering processes". Only the designation "ohne Gentechnik" may be used to indicate that a food product advertised or distributed on the German market was produced without the use of genetic engineering.

A 1.1 Purpose of the Standard

The VLOG Standard details the requirements for "VLOG geprüft" feed or "ohne Gentechnik" food production and is designed to harmonise the review of process and quality assurance systems.

This Standard serves as the basis for issuance by VLOG of a licence to use the "Ohne GenTechnik" and "VLOG geprüft" seals. Moreover, it assists businesses in developing a risk management system.

The present Standard is intended for

- Producers, processors and traders of food who wish to label their products with an "Ohne GenTechnik" seal or the designation "ohne Gentechnik"/"VLOG".
- Feed manufacturers and traders who wish to label their products with the "VLOG geprüft" seal or the designation "VLOG geprüft".

In addition to agricultural operations and logistics companies, certification under this Standard can also be extended to food producers and processors and feed manufacturers, separate from the aforementioned product labelling option ("Ohne GenTechnik" seal/"VLOG geprüft" seal).

A 1.2 VLOG as Standard-Issuing Body

The legal basis for the "ohne Gentechnik" label is the EC Genetic Engineering Implementation Act (EGGenTDurchfG). In response to the desire of interested businesses and associations for improved recognition of food without GMO, the German federal government developed the unitary "Ohne GenTechnik" seal.

Since the federal government did not want to issue the usage licenses itself and preferred to have them issued by a food sector association, on 23 March 2010, a working group of interested companies formally established the German Association Food without Genetic Engineering (VLOG) from among its members.

VLOG represents the interests of its members vis-a-vis regulators, government, media, society at large and also other market participants. Its members include, among others, farmers, businesses of the food and feed industry, certification bodies, laboratories and food retailers.

A 1.2.1 Use of the "Ohne GenTechnik" Seal

Since August 2009 food may be labelled with the nationwide "Ohne GenTechnik" seal (see Figure 1), which is a registered trademark owned by the Federal Republic of Germany. On the basis of an exclusive agreement with the Federal Ministry of Nutrition and Agriculture, VLOG is solely authorised to issue usage rights for the "Ohne GenTechnik" seal. Therefore, the use of the "Ohne GenTechnik" seal for labelling and advertising food as well as for the use on certificates is only permissible with the approval of VLOG. The specific usage is governed by a licence agreement between each licensee and VLOG. The basis for this agreement is certification of compliance with the present Standard or a standard recognised as its equivalent.



Figure 1: Seal for food certified in accordance with the VLOG Standard

Use of the “Ohne GenTechnik” seal outside of Germany

To use the German, or a translated version, of the “Ohne GenTechnik” seal, the requirements of the VLOG Standard must be met along with those pursuant to the national law of the country where the product is being placed on the market. Assessing the legality of using the “Ohne GenTechnik” seal outside of Germany is the sole responsibility of the licensee.

A suitable translation of the “Ohne GenTechnik” seal may be requested from VLOG. It is not permitted to develop one's own translated version. Products may only be placed on the market with a translated version of the seal following conclusion of a sub-licensing agreement between the licensee and VLOG. If such an agreement already exists, it must be supplemented with any new products that are to be labelled.

A 1.2.2 Use of the “VLOG geprüft” Seal for Feed

In order to explicitly point out on the package and/or the bill of lading accompanying a feed shipment, the absence of the obligation to label the product in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003, and thus their suitability for “ohne Gentechnik” food production, the trademarked “VLOG geprüft” seal (see Figure 2) may be used. The use of the “VLOG geprüft” seal is only permissible with the consent of VLOG as the proprietor of the trademark, and is regulated by a separate license agreement between VLOG and the business placing the product in the market. The basis for this agreement is certification of compliance with the present Standard or a standard recognised as its equivalent.

The English version of the seal reads: “VLOG verified”. No other translations are permitted.



Figure 2: Seal for feed certified in accordance with the VLOG Standard

A 1.3 Legal Basis & Interpretation

The following legal regulations and interpretations constitute the basis of the present Standard.

- EC Genetic Engineering Implementation Act (Gesetz zur Durchführung der Verordnungen der Europäischen Gemeinschaft auf dem Gebiet der Gentechnik und über die Kennzeichnung ohne Anwendung gentechnischer Verfahren hergestellter Lebensmittel, EG-GentechnikDurchführungsgesetz, abbreviated EGGenTDurchfG), dated 22 June 2004 (Federal Law Gazette I p. 1244, last amended by Article 58 of Regulation of 31 August 2015, Federal Law Gazette I p. 1474)
- Regulation (EC) No. 1829/2003 concerning genetically modified food and feed, dated 22 September 2003
- Regulation (EC) No. 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms, dated 22 September 2003 and the amendment to Directive 2001/18/EC
- Regulation (EC) No. 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down the procedures in matters of food safety, Article 18 (1), dated 28 January 2002
- Regulation (EC) No. 619/2011 laying down the methods of sampling and testing for the official control of feed for genetically modified material for which an approval procedure is pending or the approval of which has expired, dated 24 June 2011
- Regulation (EC) No. 834/2007 of the European Council on organic production and labelling of organic products and repealing Regulation (EEC) No. 2092/91, dated 28 June 2007
- Regulation (EC) No. 152/2009 of the European Commission laying down the methods for sampling and analyses for the official testing of feed, dated 27 January 2009
- Regulation (EU) No. 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No. 1924/2006 and (EC) No. 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No. 608/2004
- Directive 2001/18/EC of 12 March 2001 on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC

The following interpretations can provide assistance in implementing the VLOG Standard:

- Guidelines for controlling GMOs in feed – monitoring of the production, handling, use and placing on the market of feed in connection with genetically modified organisms, dated November 2011 (developed by the GMOs in Feed Project Group (PG GVO) of the Agricultural Employers Association (LAV) Working Group on Feed, with the participation of the Federal Government and The Association of German Agricultural Investigation and Research Institutions (VDLUFA), especially Chapter 5 as well as Annexes 1 and 2
- Guidelines for controlling genetic modifications in food products – orientation framework for applying the legal regulations and for controlling genetic modifications in food products of 29 March 2017 (developed by the ALS working group Monitoring of GMO Food Products)
- Additional interpretations of the legal regulations by the VLOG managing office may be found at: <https://www.ohnegentechnik.org/faq> and <http://www.ohnegentechnik.org/downloads/>

A 1.3.1 Regulations (EC) No. 1829/2003 and 1830/2003

A basic requirement regarding feed and food ingredients for the production of food labelled “ohne Gentechnik” is that they be exempt from labelling according to the requirements of Regulations (EC) No. 1829/2003 and No. 1830/2003.

Contamination with GMOs permitted in the EU by law are exempt from labelling obligations according to Regulations (EC) No. 1829/2003 and No. 1830/2003 if the following two requirements are fulfilled:

- The threshold value of the GMO content of 0.9 % per feed material/ingredient (feed/food) is not exceeded and
- The presence of the GMO content is “adventitious or technically unavoidable”.

Contamination with approved GMO content < 0.1 % is generally considered as “technically unavoidable” or “adventitious”.

Contamination present in a magnitude of > 0.1 % and ≤ 0.9 % is considered as labelling-compliant if the business has installed and demonstrably implemented organisational measures to avoid introduction of GMO material.

Assistance for labelling feed

To determine as of what level feed is subject to compulsory labelling within the meaning of Regulations (EC) No. 1829/2003 and 1830/2003, please consult in particular Part 5 and Annexes 1 and 2 of the “Guideline on controlling GMOs in feed” (http://www.ohnegentechnik.org/Leitfaden_Futtermittel).

With regard to Example 4.b 1 in Annex 1 of the abovementioned Guideline, it is explicitly noted that the waiver of the GMO marking relates only to botanical contamination of a feed material. Carryover of GMO material during the production process in a feed plant may not be considered as botanical contamination with the resulting labelling requirements.

A 1.3.2 EC Genetic Engineering Implementation Act (EGGenTDurchfG)

Any business that meets the statutory prerequisites may label its products in Germany with the words “ohne Gentechnik”. In this case, Sec. 3a and Sec. 3b of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) apply. If, however, it is intended to use the unitary “Ohne GenTechnik” seal (Figure 1), an application in this regard must be submitted to VLOG in advance (see Chapter A 1.2.1).

For raw materials to qualify for “ohne Gentechnik”, the requirements go significantly beyond the absence of a labelling obligation according to Regulations (EC) No. 1829/2003 and No. 1830/2003.

According to EGGenTDurchfG, in the production of “ohne Gentechnik” food, no GMO ingredients and additives may be used, nor may they contain or be produced from GMOs. In general, adventitious or technically unavoidable traces of genetically modified material are tolerated up to a threshold of at most 0.1 % per ingredient.

Processing aids and other substances may not be produced by GMOs.

In cases where necessary additives such as vitamins are demonstrably not available in the market in “ohne Gentechnik” quality, additives produced by GMOs may be used. Prerequisite for this exception is that these substances be listed by the EU Commission according to the procedure provided by Regulation (EC) No. 834/2007.

Feed for use in the “ohne Gentechnik” system must not be subject to compulsory labelling pursuant to Regulation (EC) No. 1829/2003 or 1830/2003. Appropriate steps are demonstrably undertaken to avoid and prevent the presence of any genetically modified material (see “Guideline for the Control of GMOs in feed”). Feed additives must be taken into consideration only if they are made from GMOs or GMO components and therefore must be labelled themselves. According to the existing legal

provisions, any feed additives that are produced by (or with the help of) GMOs need not be labelled and may be used without restrictions.

A 1.4 Additional Requirements for Processing Aids and other Substances

For the production/processing of “VLOG” products, no processing aids or other substances within the meaning of Sec. 3a (5), EGGenTDurchfG may be used which contain, consist of, or are produced from GMOs labelled in accordance with Regulation (EC) 1829/2003 or 1830/2003, or which would have to be so labelled were they placed into circulation.

A 2 Scope of Applicability of the Standard

The present Standard forms the basis for certification for the stages mentioned in A 2.1 along with associated services and activities in the EU. The VLOG Standard and the EGGenTDurchfG are based on the labelling provisions of Regulations (EC) 1829/2003 and 1830/2003 and therefore may not be applied on an analogue basis outside of the EU. For use of the VLOG Standard outside the EU, the business or certification body must apply to VLOG for permission before certification.

A 2.1 Definition of Stages in the Standard

The stages and sub-stages in the production chain for which the VLOG Standard lays down requirements are defined below. The regulations regarding the certification obligation may be found at the beginning of Parts B to H of the Standard.

If a business is applying for certification according to the VLOG Standard for activities in multiple stages and/or sub-stages, all the requirements for the respective stages/sub-stages must be checked by the auditor.

Definition of stages, including the relevant parts of the Standard:

- Logistics (Part B)
 - Transport of feed/food
 - Storage, handling of feed/food
 - Trade, drop shipping of feed/food
 - if applicable, including conversion of feed material to “VLOG geprüft”
 - Private Labelling of feed¹

(Animal transport and livestock trade → is assigned to the Agriculture stage (Part E))

- Feed manufacturing (Part C)
 - Feed manufacturing/processing
 - Mobile grinding and mixing facilities

(Transport, storage, handling and trading of feed → is assigned to the Logistics stage (Part B))

¹ For definition see Glossary

- Matrix certification (Part D)
 - Feed manufacturing/processing
 - Mobile grinding and mixing facilities
 - Transport of feed/food
 - Storage, handling of feed/food
 - Trade, drop shipping of feed/food
 - if applicable, including conversion of feed material to “VLOG geprüft”
 - Private Labelling of feed¹
- Agriculture (Part E)
 - Animal production
 - Plant-based production
 - Animal transport, livestock trade
- Group organisation Agriculture (Part F)
- Food processing/preparation (Part G)

(Transport, storage/handling and trading of feed → is assigned to the Logistics stage (Part B))
- Retail – Sale of bulk food of animal origin (Part H)

A 3 Certification Types and Certification Process

A 3.1 Audit Types

The VLOG Standard differentiates amongst the following audit types which are valid for all stages:

Initial audit:

During the initial audit, a business will be audited one first time in accordance with the “Ohne Gentechnik” Production and Certification Standard. It is a full on-site audit of all sites/business units involved in “ohne Gentechnik”/“VLOG geprüft” activities of a business. The auditor must assess all applicable requirements of the Standard and/or the established stages. The initial audit forms the basis for the initial certification of the business, provided all requirements are met.

The time of the audit is to be determined jointly by the business and certification body, taking the following into account:

- Logistics stage, feed manufacturing, group organiser, matrix organiser, food processing/preparation, retail - sale of bulk animal food products:

The audit is to take place during production but not necessarily during the production of “ohne Gentechnik” and/or “VLOG geprüft” products. In the case of seasonal production, the initial audit is to be carried out during the production season.

- Agriculture stage:
The audit is to be carried out after conversion to feeding with feed not subject to compulsory labelling.

Reduced initial audit for feed producers and/or feed logistics providers:

If the business is certified according to a recognised quality assurance standard such as QS, KAT or GMP+, initial certification may be awarded on the basis of a reduced initial VLOG audit. This is permissible if a routine audit according to the quality assurance standard was carried out and passed within the last 6 months, at most. In the reduced initial VLOG audit, only those requirements related to genetic engineering audit points will be assessed. Unassessed requirements will be marked as such in the VLOG checklist and reference will be made to the items and results of the routine quality assurance audit. The report from the routine audit according to the other quality assurance standard will be sent to VLOG along with the VLOG certification documents.

Expansion audit:

If, during the validity period of the certificate, the business wants to include new product groups, processes, production lines, etc. into the scope of applicability, this is to be assessed within the framework of an expansion audit.

Whether a full audit must be performed or only specific requirements checked will be determined by the relevant certification body.

If the requirements are met, the VLOG certificate will be amended to include the new product groups, processes, etc. If no complete on-site audit is performed, the amended certificate will expire at the same time as the certificate for the previous routine audit.

Follow-up audit:

Follow-up audits serve to assess the implementation and effectiveness of corrective actions at the audited business. The auditor will only evaluate specific requirements of the VLOG Standard on-site. If the follow-up audit has been announced beforehand, the certification body must document the reason for the announcement of the audit. The certification body is to select the timing of the follow-up audit such that the efficacy of the specified measures can be reviewed.

Routine audit (to renew certification):

The routine audit is a full on-site audit of all sites/business units involved in “ohne Gentechnik”/“VLOG geprüft” activities of the business. All requirements of the present Standard will be assessed by the auditor. If the requirements of the VLOG Standard are met, the business will be recertified.

Each business is responsible for updating the certification/having the routine audit performed. The audit takes place during VLOG-compliant activity and/or production of “ohne Gentechnik” and/or “VLOG geprüft” products. The routine audit is usually announced beforehand.

The audit interval requirements are set forth in Chapters B 2.1, C 2.1, D 2.3, E 2.2, F 2.4, G 2.2 and H 2.2.1.

Audit on suspicion:

Audits on suspicion serve to investigate suspected non-compliance; the auditor will only assess selected criteria of the VLOG Standard on-site. Audits on suspicion are generally not announced beforehand. If the audit on suspicion is announced beforehand, the certification body must document the reason for the announcement of the audit.

Combination audit:

Compliance with the VLOG Standard may be assessed during an audit in combination with other standards in order to take advantage of synergies. All prescribed VLOG facility descriptions, checklists and other documents must be fully completed.

A 3.2 Types of Certification

With regard to VLOG certification of businesses, the Standard differentiates between

- Individual certification of businesses: For the requirements and procedure of individual certification see Chapter A 3.2.2 et seq.
- Matrix certification for logistics and feed manufacturing (for associated sites in the areas of logistics and feed manufacturing): For requirements and procedure see Chapter D 2.1.
- Group certification in agriculture (for associated agricultural operations): For requirements and procedure see Chapter F 2
- Group certification in retail (for associated branch operations): For requirements and procedure see Chapter H 2

A 3.2.1 Commissioning External Service Providers

If the business outsources activities subject to certification (see Chapter B 1, C 1, E 1, F 1, G 1, H 1) to external service providers (“contractors”), the contractors must undergo an on-site audit according to the VLOG Standard using the VLOG checklist.

The basis for the audit is

- either a written contractual agreement between the client and contractor, or
- an independent certification application filed by the contractor with a VLOG-recognised certification body.

If the audit is performed on the basis of the contractual agreement between the client and contractor, the scope of the auditor's on-site assessment is limited to assessing the contractor's production for compliance with the requirements of the VLOG Standard.

The audit interval for the contractor depends on its the VLOG-stage and risk category/grading (if relevant). The contractor does not receive a VLOG certificate and may only be commissioned once the contractor's activities necessary for certification are successfully audited (see Chapter A 3.1). As a minimum requirement, the agreement between the client and contractor must contain the details of the outsourced activity, its scope as well as the contractor's obligation to comply with the current VLOG Standard.

If the audit is performed based on an independent certification application submitted by the contractor, all VLOG commissions (potentially from a range of clients) are to be audited at the contractor's site. The contractor will receive its own VLOG certificate for the services rendered.

A 3.2.2 Requirements for Individual Certification²

The following requirements must be met at the beginning of the auditing process:

- Signed contract with a VLOG-recognised certification body
- Signed Standard Usage Agreement³ with VLOG

² Requirements for Group- and Matrix Certification see Chapter D 2.1, F 2.1, H 2.1

³ Known as “Certification Agreement” until 20 June 2017. A Standard Usage Agreement signed by VLOG must be in place prior to the issuance of the certificate.

A 3.3 Applying for Certification

The business applies for certification with a VLOG-recognised certification body and specifies the desired scope of applicability for certification (stage/sub-stage/product group). The business and the VLOG-recognised certification body enter into a written agreement regarding performance of neutral audits and certification according to the VLOG Standard.

A 3.4 Scope of Applicability/Certification

The business is to request the area of application desired for certification, which is then audited and confirmed in the certificate. Areas of application may include animal types or categories, products, or services (e.g. “trade in xy (product group)”, “packaging of eggs”). Products are to be listed on the certificate in product groups.

The scope of applicability listed on the VLOG certificate is defined in accordance with Annex 12. In addition to the defined area of applicability, it is possible to specify this further on the certificate (e.g. specific customer requests). Product-specific information (such as the brand names of feeds or other products) may not appear on the certificate but must be listed in an annex.

- If the scope of applicability relates to the production of eggs in individually or group certified facilities, the print numbers of the eggs for which the certificate applies must be included in an appendix to the certificate.
- If the scope of applicability concerns the Feed Stage, Mobile Grinding and Mixing Facilities Sub-stage, then the license plates of the mobile grinding and mixing facilities to be audited within the scope of the VLOG certification will be listed in the scope of applicability of the VLOG certificate.

If new product groups, processes, etc. are to be included within the scope of applicability, the certification body will decide whether this must be done through an expansion audit or on the basis of previously submitted documents (see Chapter A 3.1).

A 3.5 Risk Grading of Businesses

The VLOG Standard follows a risk-based approach for the evaluation of processes and monitoring in the business. This is done through risk grading of the business. The risk grading serves to identify and estimate potential sources of introduction and risk of carryover of GMOs as well as any risk of commingling and confusion with non-compliant products in the business. With this in mind, the auditor⁴ will evaluate the organisation as well as the physical and temporal processes in the entire business. The use of GMOs and non-compliant raw materials and/or feed in the business will result in a higher risk grading.

- In the Agriculture and Food Processing/Preparation Stages the businesses will be graded into risk categories as per the criteria in Chapters E 2.1 and G 2.1, based on risks.
- In the Feed Manufacturing and Logistics Stages, grading into risk categories will be based on the production system of “VLOG geprüft”/“VLOG” production (e.g. GMO at the site or solely production exempt from mandatory labelling).

⁴ Or group organizer, in the case of group certifications

- In the Retail Stage, the organisation of purchasing (centralised or decentralised) is relevant for risk grading.

Depending on the business stage, the risk grading and/or risk category will have an impact on audit intervals and/or the number of analyses.

Grading will be done by the business before the audit; it is assessed and, if necessary, redefined by the auditor and evaluator in every audit. The definition is to be documented or modified as needed in the facility description and in the checklist.

A 3.6 Planning of Audits

In the case of announced audits

- the audit date/time and expected duration thereof as well as
- the scope of the audit

are to be determined jointly by the auditor/certification body and the business. The auditor/certification body must draw up an audit plan.

A 3.7 Performance of the Audit

The on-site audit is to be organised as follows:

Introductory meeting:

- Introduction of the auditor and the persons involved
- Explanation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule

Following the document and facility inspection (sequence to be defined by the auditor):

Document inspection:

- Review of the facility description and verification of risk grading
- Inspection of the relevant business documents (e.g. organisational chart/organisation, quality management system, bills of lading)
- Verification of compliance with the Standard requirements (e.g. labelling of raw materials/feed, risk management, etc.)
- Mass flow control (input and output plausibility check in the facility)

Facility inspection:

- On-site assessment of the production areas, facilities and relevant production processes
- Verification of compliance with the system requirements (e.g. segregated handling, awareness of the risk of introduction and carryover of GMOs, etc.)
- Interview of staff
- Sampling as provided for and/or in the case of suspected non-compliance

Grinding and mixing facilities:

- Mobile grinding and mixing facilities: At least two of the facilities that are registered for VLOG certification will be inspected by the auditor (in particular, visual inspection and comparison of documents). The selection is performed in a risk-based manner. If the business only uses one facility for “VLOG geprüft” production, then this facility is to be inspected.
- Stationary grinding and/or mixing facilities: The inspection includes all facilities associated with the agricultural operation.

Final discussion:

- Summary of findings/deviations and preliminary result

Corrective actions may be agreed in the final meeting and established in writing. This will not affect the audit results.

If corrective actions are determined and agreed at the latest 4 weeks after the audit (see Chapter A 3.9.1), this must also be documented in writing and before the certificate is issued.

The auditor is authorised to take additional samples and/or carry out other GMO tests in accordance with risks or in suspicious cases.

The competent certification body decides on the final audit result after the audit.

A 3.8 Audit Documentation

The auditor documents the evaluation of the requirements and, if applicable, any identified deviations in the stage-relevant VLOG checklists in their most recent version. The certification body may create and use checklists in a customised format on the basis of the current VLOG checklists, provided the content of the checklist, the wording of the audit items and the underlying results calculation are used without change.

At the end of the audit, the completed VLOG checklist(s) are signed by the auditor and the business.

A 3.9 Evaluation of Requirements

The auditor examines and evaluates the compliance with each VLOG Standard requirement.

The following grading levels have been set for the evaluation of requirements at all stages:

Grading	Description	Points
A	Full compliance with a requirement	10 points
B	Minor to moderate deviations from the requirement	5 points
C	Non-compliance or major deviation from the requirement	- 10 points
N.A.	Not applicable	-
Risk	Major deviation, meaning that a risk to “ohne Gentechnik”/“VLOG geprüft” labelling cannot be ruled out	- 15 % of total points ⁵
KO	Requirements with a critical impact on “ohne Gentechnik/VLOG geprüft” labelling in case of failure to comply	Audit not passed

Table 1: Evaluation of requirements

⁵ 15% of the points total will be deducted for each criterion classified as a risk.

A “risk” grade may be assigned to all requirement items not defined as KO requirements.

Risk grading is assigned to all deviations that endanger the safety of the “ohne Gentechnik” system, for example, sampling and testing plan not adequately implemented.

KO requirements may only be assigned an A, B, or KO grade. They are listed in the respective chapters of the stages and marked accordingly in the checklists.

If an auditor reaches the conclusion that a particular requirement is not applicable to the business, this requirement may be assessed as N.A. (= not applicable). A KO requirement may not be graded N.A.

The auditor must demonstrably justify and document any identified deviations (B and C grading or Risk and KO grading) as well as the assessment N.A. in the checklist.

A 3.9.1 Determination and Handling of Corrective Actions

Procedure:

- The business must determine in writing corrective actions for all deviations identified (B and C grading, as well as Risk and KO grading) and the deadlines for their implementation.
- Corrective actions and deadlines must be presented by the audited business within 4 weeks after the audit and are to be approved by the competent certification body.

A certificate may only be issued after the business has defined corrective actions and their deadlines for all deviations and these have been released by the auditor/certification body.

B and C deviations may be examined by subsequent submission of representative documentation or, if this is not possible, by an on-site follow-up audit. This is to be decided by the certification body in a risk-based procedure.

Monitoring of the implementation of the corrective actions lies within the scope of responsibility of the certification body; the statements (see Chapter A 3.9.2) and/or catalogue of sanctions per Annex 10 apply if the business is sanctioned and/or in connection with corrective actions.



Explanation: Corrective actions and deadlines may be agreed in the final meeting and documented in writing.

A 3.9.2 Audit Evaluation and Certification Conditions

The calculation of the audit result is based on the points specified in Chapter A 3.9.

Audit results	Status	Certificate, measures
<ul style="list-style-type: none"> • more than 75 % of the maximum points • no KO grading 	passed	<ul style="list-style-type: none"> • certificate
<ul style="list-style-type: none"> • more than 75 % of the maximum points • no KO grading • one risk grading 	passed/not passed	<ul style="list-style-type: none"> • decision of the certification body about suspending the certificate, depending on the severity and relevance of the risk of deviation • VLOG certificate will not be issued until corrective actions have been implemented and reviewed

Audit results	Status	Certificate, measures
		<ul style="list-style-type: none"> certification body decides whether a follow-up audit is necessary
<ul style="list-style-type: none"> less than 75 % of the maximum points no KO grading 	not passed	<ul style="list-style-type: none"> no certificate the certification body notifies VLOG within 2 working days about failure to pass audit a new routine audit must be performed
<ul style="list-style-type: none"> one or more KO gradings 	not passed	<ul style="list-style-type: none"> no certificate or, for group members, no inclusion in the certification of the group organiser certification body must suspend the current VLOG certificate within 2 working days certification body notifies VLOG about the KO grading within 2 working days (does not apply to audit of group members who did not pass) the business must implement the required corrective actions before the certificate is re-issued a new routine audit must be performed

Table 2: Audit Evaluation and Certificate Issuance

If the audit is not passed, VLOG will decide on the termination of the Standard Usage Agreement, and also on the revocation of the respective usage licence for the “Ohne GenTechnik” and/or “VLOG geprüft” seal from licensees.

A 3.10 Evaluation/Review by the Certification Body

Within the scope of the evaluation/review of the VLOG audit, the grading of the auditor in the completed checklist and the information indicated in the facility description will be re-checked by the certification body for completeness and plausibility. In this regard – if relevant for the respective stage – the risk grading is also to be reviewed by the certification body and corrected, if appropriate. If the risk grading is corrected, the business must be notified as soon as possible.

The certification body is entitled to perform follow-up audits, audits on suspicion and additional checks (see Part H).

A 3.11 Certificate Issuance

A 3.11.1 Requirements for Certificate Issuance

VLOG will only accept certificates according to the VLOG Standard from certification bodies that have concluded a Recognition Agreement with VLOG.

After passing an audit and taking into consideration Chapter A 3.9.2, the certification body will issue the business with a certificate according to the VLOG Standard no later than 8 weeks after the audit⁶. If the certificate is not issued within 8 weeks after the audit, a new routine audit is performed.

Businesses or facilities undergoing initial certification are authorised to start shipping only after the issuance of the certificate.

A 3.11.2 Requirements for VLOG Certificates

VLOG certificates will be issued according to Annex 11. Layout deviations are not permissible without approval by VLOG. The scope of application of the certificate must be formulated pursuant to Chapter A 3.4.

If information about the certified business sites and/or scope of applicability is indicated on a certificate annex, the following additional requirements apply:

- The annex must contain a reference to the certificate, including specification of the unique certificate identification number.
- The complete name of the certified business must be listed in the annex.
- The annex must be assigned a unique identifier.
- The certificate must contain a reference to the annex, including specification of this unique identifier.

A 3.11.3 Validity Period of the VLOG Certificate

The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date)⁷.

A 3.11.4 Transferring Certification in the Event of Change of Ownership, Certification Body or Group/Matrix Member

Transferring Certification in the Event of Change of Ownership or Change of Business Name

If a change of ownership/change of business name occurs at a VLOG-certified business/site, VLOG certification may be transferred to the new business.

The following steps must be taken in this regard:

1. The previously VLOG-certified business gives the certification body permission to use the data for the new business.
2. The certification body undertakes VLOG certification of the new business on the basis of previously submitted audit documents; the period of validity of the updated VLOG certificate may not exceed that applicable to the previous certificate.
3. The certification body provides the updated certificate and the information regarding change of ownership/change of business name to VLOG as soon as possible.

⁶ If an individual certification with multiple locations involves audits at several locations, the 8 weeks are calculated from the audit of the last location.

For group certifications and matrix certifications, the 8 weeks count as follows:

- for the initial certification: from the last audit necessary for the initial certification for a group/matrix member or group/matrix organiser (depending on which audit occurs later)
- for the follow-up certification: from the audit of the group/matrix organiser

⁷ Exceptions for QA-certified grinding and mixing facilities and/or QA-certified livestock dealers and farmers, which are part of a group certification, can be found in Chapters: C 2.1 and E 2.2.

If applicable, further requirements must be clarified with the responsible certification body.

For group certifications, the following additional rule applies: The risk categories and audit intervals of the group members will remain in effect.

Transferring Certification in the Event of a Change of Certification Body

For a change of certification body, VLOG certification may be updated by the new certification body on the basis of the previous routine audit. This requires the consent of the certified business as well as of the former and new certification bodies.

The following steps must be taken in this regard:

1. The VLOG-certified business declares its consent to the previous certification body for the data to be forwarded to the new certification body.
2. The previous certification body informs VLOG regarding the termination/cancellation of the contractual relationship with the VLOG-certified business.
3. The previous certification body transfers the complete audit and certification documents from the most recent routine audit, and any follow-up audits, to the new certification body.
4. The new certification body may certify the business according to the VLOG Standard on the basis of the complete audit documents; the period of validity of the updated VLOG certificate may not exceed the period of validity of the previous certificate.
5. The new certification body sends the updated certificate and information regarding the recertification to VLOG.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.

For group-/matrix certifications, the following additionally applies: The risk categories and audit intervals of the group-/matrix members will remain in effect. The change of certification body does not result in a repeated initial certification (see Chapters F 2.2.2 and F 2.2.3 but triggers a follow-up certification (see Chapter F 2.4).

Change of group/matrix member

If a group/matrix member changes to a different VLOG group/matrix, the member's most recent group/matrix audit can be recognised as an audit for the new group/matrix certification.

The following steps must be taken in this regard:

1. The previous group/matrix organiser declares its consent to the previous certification body for the data to be forwarded to the new certification body.
2. The previous certification body transfers all audit and certification documents from the most recent routine audit of the respective group/matrix member to the new certification body.
3. The new certification body checks which tasks were performed by the group/matrix organiser in the previous VLOG group/matrix and compares them to the new VLOG group/matrix and the responsibilities of the new group/matrix organiser.
4. The group/matrix member is removed from the previous group/matrix organiser's list of members.
5. The new certification body can recognise the most recent group/matrix audit of the group/matrix member as an audit for the new group/matrix certification based on the existing audit documents. In this case, the business/site can be included in the VLOG group/matrix without an additional audit.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.

The risk categories and audit intervals of the group member/matrix site will remain in effect. The change of a group/matrix does not result in a repeated initial certification, but triggers a follow-up certification.

A 4 Integrity Programme

The Integrity Programme comprises various measures intended to ensure the quality and correct implementation of the VLOG Standard. The selection is performed, among others, in a risk-based manner or by reason of complaints. Compliance with Standard requirements is verified as part of onsite inspections of Standard participants. The Integrity Programme also includes a review of certification bodies and auditors. VLOG or a third party commissioned by VLOG will perform inspections, including sampling, if applicable, within the scope of “Integrity Audits” at the sites of licensees and VLOG-certified businesses. The inspections may be performed in all areas of the business that are relevant to “Ohne Gentechnik” and/or “VLOG geprüft” production as well as at any transport, pre-processing, processing or packaging operations involved in the auditing and certification process, if applicable.

Furthermore, inspections may also be carried out in businesses that are contractually integrated into the “Ohne Gentechnik” system of a group organiser within the scope of group or matrix certification pursuant to the VLOG Standard. Monitoring of the Integrity Programme is to be coordinated with the business involved.

Inspections may be performed with and without advance notice.

A 5 Review of the VLOG Standard

The VLOG Standard is reviewed, revised and supplemented on a regular basis. The VLOG Board of Directors is advised in this regard by the Standard Technical Working Group. In order to enable information about the upstream and downstream areas of food production to be incorporated into the Standard, relevant sectors are represented in the Standard Technical Working Group. The VLOG Board of Directors appoints the members of the Standard Technical Working Group.

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The section below describes the specific rules and requirements for the Logistics Stage of food and feed and its sub-stages. The requirements for the livestock trade and animal transport are assigned to the Agriculture Stage (Part E).

B 1 Stage Definition and Mandatory Certification

i *Explanation: VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG-certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found at https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard/Weitere_Dokumente/Als_gleichwertig_anerkannte_Standards.pdf*

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Transport: Transport means conveying goods from one place to another.			
Feed/Food	<p>For transport of bulk “VLOG geprüft” feed and/or bulk VLOG-certified food/ingredients between VLOG-certified businesses, provided that at least one of the following statements is accurate:</p> <ul style="list-style-type: none"> • Transport is <u>not</u> integrated into the risk management of a VLOG-certified business. • <u>No</u> agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the carrier and the certified business. 	<p>For the transport of bulk “VLOG geprüft” feed and/or bulk VLOG-certified food (ingredients) between VLOG-certified businesses, provided that all of the following three statements are accurate:</p> <ul style="list-style-type: none"> • Order placed by a VLOG-certified business • Transport is integrated into the risk management of a VLOG-certified business. There is adequate proof of integration. • An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the carrier and the certified business. 	B 1-B 3

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
		For the transport of sacked/tamper resistant packaged “VLOG geprüft” feed and/or VLOG certified food.	B 1-B 3
		For the transport of bulk VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of commingling or tampering.	B 1-B 3
Storage/handling: The service of temporary storage of food and/or feed on behalf of a third party or storage in the business' own external warehouses. Handling comprises all activities directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).			
Feed	For storage/handling of bulk “VLOG geprüft” feed	For storage/handling of bagged/tamper resistant packaged feed	B 1-B 4
Food	For storage/handling of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of commingling or tampering.	For storage/handling of bulk, VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of commingling or tampering.	B 1-B 4
Trading: Trading comprises all activities within the scope of selling and reselling goods that are not produced at one's own facilities. In contrast to drop shipping, the trader takes physical possession of the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).			
Feed	For traders that want to label bulk feed that is already VLOG-certified as “VLOG geprüft”* on the bills of lading.	For trading of bagged/tamper resistant packaged feed (except for private labelling).	B 1-B 3, B 5, J 1

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	For traders that want to convert non-VLOG- certified feed material into “VLOG geprüft” quality and label it as such*.		B 1-B 3, B 5 or B 6, B 7, J 1
	For traders that sack and label bulk “VLOG geprüft”* feed, and that also want to designate it as “VLOG geprüft” on labels, declarations or bills of lading.		B 1-B 3, B 5, J 1
	Mobile grinding and/or mixing facilities: Trading/sale of “VLOG geprüft” oil by a grinding and/or mixing facility, if this oil is used for dust control in the grinding and/or mixing facility and the grinding and/or mixing facility is not VLOG-certified.	Mobile grinding and/or mixing facilities: Trading/sale of “VLOG geprüft” oil by a grinding and/or mixing facility, if this oil is used for dust control in the grinding and/or mixing facility and the grinding and/or mixing facility is VLOG-certified.	B 1-B 3, B 5, J 1
Food	For trading of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of commingling or tampering.	For trading of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of commingling or tampering.	B 1-B 3, B 5

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	<p>For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that:</p> <ul style="list-style-type: none"> The trader issues delivery slips of its own for certified goods with the “VLOG” label and/or The trader commissions non-VLOG-certified carriers or the transport site is <u>not</u> included in the risk management of a VLOG-certified business 	<p>For trading of sealed VLOG-certified food between two VLOG-certified businesses, provided that all of the following conditions are met:</p> <ul style="list-style-type: none"> The goods are certified in accordance with the VLOG Standard The originating processing business is listed on the delivery slips The certified goods are labelled “VLOG” on the delivery slip The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B1. There is adequate proof of integration. After loading, the vehicle tank, container, etc. is sealed by employees of the issuing processing business 	B 1-B 3, B 5
		<p>For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.</p>	

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Drop shipping: Drop shipping refers to the trading method wherein the goods are transported directly from the supplier to the customer of the drop shipper. The drop shipper does not take physical possession of the goods, but has a contractual relationship with the customer and issues the invoice for the goods.			
Feed	For drop shipping of bulk “VLOG geprüft” feed	For drop shipping of bagged/tamper resistant packaged feed (except for private labelling).	B 1-B 3, B 6
	For drop shippers who want to convert non-VLOG-certified feed material into “VLOG geprüft” quality and label it as such*.		B 1-B 3, B 6, B 7
Private labelling of feed: Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the private labeller's specifications or the goods are purchased from the manufacturer and sold in the Private Labeller's name.			
Feed	For businesses that operate as private labellers for bagged and/or bulk feed and market/label the feed as “VLOG geprüft”.	For businesses that operate as private labellers for feed and do not market/label the feed as “VLOG geprüft”.	B 1-B 3, B 8, J 1

* (Wording or seal according to Chapter A 1.2.2)

B 2 Details of the Certification Procedure

B 2.1 Audit Frequency

In the case of individual certification in the Logistics stage, annual routine audits are performed.



Explanation: For matrix certifications in logistics and feed manufacturing, the audit follows the requirements of Chapter D 2.3.

B 2.2 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Risk management (B 3.3)
- Segregation of the flow of goods/exclusion of commingling (B 3.5)
- Handling of non-compliant feed, raw materials and products (B 3.6)
- Traceability (B 3.8)
- Crisis management (B 3.11)
- Incoming goods inspection (B 4.1, B 5.1 , B 6.1)

B 3 General Requirements for Businesses

B 3.1 Facility Description

The facility description (Annex 13) is on file and up-to-date.

The certification body and, in case of matrix certification, the matrix organiser are promptly informed about major changes pertaining to VLOG certification.



Explanation: Information provided in electronic form will be accepted. The up-to-date facility description, annexes and the documents and test results listed therein must be submitted to the auditor for viewing. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG. Major changes pertaining to VLOG certification include, e.g., change of risk category, products and/or processes.



Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive

differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.

B 3.2 Assignment of Responsibilities/Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.



Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

B 3.3 Risk Management (KO)

Risk analysis

A documented risk analysis has been created for all relevant feed, raw materials, products, procedures and processes, including risk evaluation for “ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and feed for the “VLOG geprüft” and/or “ohne Gentechnik”/“VLOG” area (incl. countries of origin)
- Handling of feed, raw materials and products that meet the requirements for “ohne Gentechnik” or “VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “ohne Gentechnik” or “VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions have been introduced and implemented for the identified risks based on the risk analysis.

B 3.4 Commissioning External Service Providers

If activities are outsourced to external service providers, the latter must be integrated into the business’ risk management system (see Chapter B 3.3).

For activities requiring certification (Chapter B 1, C 1, G 1) in the areas of manufacturing, transport, storage, handling, trade and/or drop shipping that VLOG-certified businesses outsource to external service providers, an audit or certification of the service provider is to be performed in accordance with Chapter A 3.2.1.

B 3.5 Segregation of Goods Flows/Exclusion of Commingling (KO)

The physical and/or temporal separation of goods flows ensures that at no time feed, raw materials or products that are not suitable for “VLOG geprüft” or “ohne Gentechnik” labelling come into contact with the goods flow for feed, raw materials or products with “VLOG geprüft” or “ohne Gentechnik” labelling. Suitable procedural steps are to be in place to ensure that the carryover of GMO or non-compliant feed, raw materials and/or products is reduced to an at least adventitious and technically unavoidable level. In addition, all feed, raw materials and products must be clearly and consistently labelled in all process steps.

Transport vehicles are to be verifiably cleaned at least in the dry.

B 3.6 Handling of Non-Compliant Feed, Raw Materials and Products (KO)

An effective and documented procedure for handling non-compliant feed, raw materials and products is to be in place. At a minimum, it must include the following points:

- Labelling of affected feed, raw materials and products
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.



Explanation: Non-compliant feed, raw materials and products must be identifiable, e.g. based on positive test results.

B 3.7 Outgoing Goods Control/Labelling on Bills of Lading

Feed

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2).

It must be clearly evident to which feed item the labelling refers.



Explanation: VLOG recommends the following wording for labelling feed exempt from labelling and not certified by VLOG:

“The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”

Food

VLOG-certified raw materials and products must be clearly labelled on all bills of lading using the wording “VLOG” and/or the “Ohne GenTechnik” Seal.

It must be clearly evident to which raw material or product the labelling refers.

If no bills of lading are generated in specific systems (e.g. milk collection), a clear contractual stipulation for the delivery must ensure the above-listed labelling.

Only feed, raw materials and products that meet the requirements for “VLOG geprüft” or “VLOG” labelling may be labelled as such.



Explanation: VLOG recommends the following wording for labelling food items that meet the requirements of the EGGenTDurchfG, but are not included in the VLOG certification of the business:

“Ingredient suitable for the production of “ohne Gentechnik”-labelled food.”

B 3.8 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed or “VLOG” raw materials and products present in the business can be clearly identified at all times.
- The goods flow of “VLOG geprüft” feed or “VLOG” raw materials and products as well as quantity lists and evaluations can be generated within one working day to allow conclusions about goods flows and their plausibility.



Explanation: For this purpose, the following data is to be determined, among others:

- *Information on supplier and delivery date*
- *Quantity*
- *Creation of batches, if applicable*
- *Information on delivery date and supplied customers*

B 3.9 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 initiated for justified complaints and feedback.

B 3.10 Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, is to be in place for non-compliant feed or raw materials according to the VLOG Standard.

B 3.11 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 “VLOG geprüft” feed or “VLOG” raw materials/products. This procedure must be implemented and includes at least:

- The steps to follow in the event of an incident
- Assigned responsibilities including substitute rules

- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (see Annex 31 or 35), of the certification body and of affected business partners and customers
- Legal advice (if required)

The crisis management procedure is to be tested internally at least once a year with regard to practicality, functionality and immediate implementation, with results documented.

B 3.12 Corrective Action/Ongoing Improvement Process

If non-compliant feed, raw materials and 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 period. Both are to be documented.

B 3.13 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to the “VLOG geprüft”/“VLOG” transport, storage, handling, drop shipping or trading are to be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the batch/lot + one year, but not less than two years.



Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, training documents etc.

B 3.14 Staff Training

All staff members involved in securing the operating procedures of relevance to “VLOG geprüft” or “VLOG” labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction is to take place before they take up their activity as well as on an ongoing basis, at least once a year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.



Explanation: The intensity of training varies depending on the staff member and is guided by the responsibility of the staff member for the proper flow of the “VLOG geprüft” or “VLOG” operating procedure.

B 3.15 Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business specific Standard requirements of the Logistics 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 units.

B 4 Specific Requirements for Storage and Handling

B 4.1 Incoming Goods Inspection (KO)

Feed

The bills of lading or in the case of packed goods the packaging are to be checked for the “VLOG geprüft” label or “VLOG geprüft” seal within the scope of incoming goods inspection.

Raw materials

The bills of lading are to be checked for the “VLOG” label or “Ohne GenTechnik” seal within the scope of incoming goods inspection.

B 5 Specific Requirements for Trade

B 5.1 Incoming Goods Inspection (KO)

The incoming goods procedure must ensure that all “VLOG” raw materials/products or “VLOG geprüft” feed meet(s) the requirements.

Within the scope of the incoming goods inspection of VLOG-certified raw materials, products and feed

- the bills of lading or in the case of packed goods the packaging must be checked for “VLOG geprüft” and/or “VLOG geprüft” seal or “VLOG” and/or “Ohne GenTechnik seal identification.
- the VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

A complaint is to be issued to the supplier for an incomplete bill of lading. The feed or raw materials may be marketed as “VLOG geprüft” and/or “VLOG” only if this quality has been verifiably confirmed by the VLOG-certified supplier.

B 5.2 Sampling and Testing

Feed and/or raw materials and products that are relevant for the “VLOG geprüft”/“VLOG” trade are subject to risk-based sampling and GMO testing in accordance with the following specifications.

B 5.2.1 Sampling and Testing Plan

A written sampling and testing plan must be available that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification).
- Frequency and periods of sampling and GMO testing
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and testing plan is to be implemented according to schedule.

Sampling and GMO testing will not be required if the traded feed and/or raw materials/products cannot be tested for genetic engineering for technical reasons.

In this case the test plan must provide for a risk analysis that concludes no need to sample/test any feed/raw materials/products.



Explanation: The VLOG homepage offers an assessment aid to determine the suitability raw materials and products for testing: http://www.ohne-gentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf.

B 5.2.2 Frequency of Sampling and Testing

The annual sampling and testing frequency in the business must at least follow the specifications listed in Table 3 and Table 4.

All samples to be tested must be processed in a VLOG-recognised laboratory.

Trading of VLOG feed

<div> <div>List of VLOG products at site</div> <div>List of all products handled at the site</div> </div>	Bulk “VLOG geprüft” feed	VLOG bagged goods
	Annual minimum number of samples/tests of “VLOG geprüft” outgoing goods ⁸⁹	
Bulk “VLOG geprüft” feed + bulk feed not subject to mandatory labelling, if applicable	up to 10,000 t/year: 1 sample/test ≥ 10,000 to 50,000 t/year: 2 samples/tests ≥ 50,000 to 100,000 t/year: 4 samples/tests ≥ 100,000 to 200,000 t/year: 6 samples/tests ≥ 200,000 to 300,000 t/year: 8 samples/tests for every additional 100,000 t or part thereof: 2 additional samples/tests	no (additional) sampling/testing
Bulk “VLOG geprüft” feed + bulk feed subject to mandatory labelling	up to 2,000 t/year: 1 sample/test > 2,000 to 5,000 t/year: 3 samples/tests > 5,000 to 10,000 t/year: 5 samples/tests ≥ 10,000 to 50,000 t/year: 10 samples/tests ≥ 50,000 to 100,000 t/year: 15 samples/tests ≥ 100,000 to 200,000 t/year: 20 samples/tests ≥ 200,000 to 300,000 t/year: 25 samples/tests for every additional 100,000 t or part thereof: 5 additional samples/tests	no (additional) sampling/testing

Table 3: Yearly minimum of sampling/testing at the Trading of Feed sub-stage

⁸ All feed quantities relate exclusively to “VLOG geprüft” feed or feed that is to be labelled as “VLOG geprüft”.

⁹ The sampling and testing obligation applies only to traders that store feed on site (or have external service providers store it). If the trader only engages in trading and transport without (intermediate) storage, it is not necessary to test outgoing goods.

Trading of VLOG food (raw materials/products):

List of all bulk raw materials/products handled at the site ¹⁰	Annual minimum number of samples/tests of outgoing VLOG goods
bulk “ohne Gentechnik” raw materials/products	2 x per year
bulk “ohne Gentechnik” raw materials/products + bulk raw materials/products not subject to mandatory labelling but not “ohne Gentechnik” compliant	6 x per year
bulk “ohne Gentechnik” raw materials/products + raw materials/products subject to mandatory labelling	12 x per year

Table 4: Yearly minimum sampling/testing at the Trading of Food sub-stage



Explanation: The number of samples may be correspondingly reduced if the number of lots received in the audit period is smaller than the minimum number of samples listed in Table 4.

B 5.2.3 Handling of Positive Test Results

Positive test results are to be treated according to Annex 6 (for food) and Annex 5 (for feed).

The handling of the affected feed, raw materials and products in the business must follow the specifications of Chapter F 3.6.

B 6 Specific Requirements for Drop Shipping**B 6.1 Incoming Goods Inspection (KO)**

When “VLOG” raw materials/products or “VLOG geprüft” feed are drop shipped, the supplier’s VLOG certification is checked regularly, at least once per year.

B 7 Specific Requirements for Conversion of Feed to “VLOG geprüft”

This chapter governs the conversion of feed material, which is not subject to compulsory labelling, to “VLOG geprüft” quality. It applies exclusively in combination with the requirements for traders (see Chapter B 5) or drop shippers (see Chapter B 6).

¹⁰ The tamper-proof packaging of raw materials/products has no influence on the number of tests



Explanation: If testing is mandatory (see Chapter B 7.2), the drop shipper may convert feed only if the drop shipper can organise the sampling and testing of the feed.

B 7.1 Specific Requirements for Risk Management

In addition to the requirements in Chapter B 3.3, risk analysis includes the following items:

- Risk grading of feed (risk-prone/not risk-prone) for the “VLOG geprüft” area
- Additionally, in the case of drop shipping: No later than at the conclusion of a purchase agreement by the drop shipper and the supplier, the drop shipper must have a written confirmation from the supplier that the goods are not subject to compulsory GMO labelling (which must be batch-specific or for a specific period of time)



Explanation: An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Assessment_Aid_-_at_Risk_Feed.pdf.

B 7.2 Sampling and Testing for Conversion

Based on the requirements of Chapter B 5.2, the business must perform sampling and testing with at least the frequency indicated in Table 5 each year.

All samples to be tested must be processed in a VLOG-recognised laboratory.

List of all products at site \ Area	Sampling/testing at “VLOG geprüft” incoming goods	Sampling/testing in “VLOG geprüft” outgoing goods inspection (trade incl. conversion)
Only bulk “VLOG geprüft” feed and/or bulk feed not subject to compulsory labelling	For every batch of feed material graded as risk-prone and are supposed to convert: 1 sample/test	up to 10,000 t/year: 1 sample/test ≥ 10,000 to 50,000 t/year: 2 samples/tests ≥ 50,000 to 100,000 t/year: 4 samples/tests ≥ 100,000 to 200,000 t/year: 6 samples/tests ≥ 200,000 to 300,000 t/year: 8 samples/tests for every additional 100,000 t or part thereof: 2 additional samples/tests
Only bulk “VLOG geprüft” feed and bulk feed subject to compulsory labelling, plus, if applicable, bulk feed not subject to compulsory labelling	For every batch of feed material graded as risk-prone and is supposed to convert: 1 sample/test	up to 2,000 t/year: 1 sample/test > 2,000 to 5,000 t/year: 3 samples/tests > 5,000 to 10,000 t/year: 5 samples/tests ≥ 10,000 to 50,000 t/year: 10 samples/tests ≥ 50,000 to 100,000 t/year: 15 samples/tests ≥ 100,000 to 200,000 t/year: 20 samples/tests ≥ 200,000 to 300,000 t/year: 25 samples/tests for every additional 100,000 t or part thereof: 5 additional samples/tests
An exclusive drop shipper or trader that transports the goods but does not store/handle the goods	For every batch of feed material graded as risk-prone and supposed to be converted: 1 sample/test If soy, rapeseed/canola, corn/maize, sugar beets or cotton are converted and all lots are graded as non-risk-prone, the following applies:	

List of all products at site	Area	Sampling/testing at "VLOG geprüft" incoming goods	Sampling/testing in "VLOG geprüft" outgoing goods inspection (trade incl. conversion)
		Monitoring with at least one sampling/test per year ¹¹ . The exact number is to be determined by the business based on risk (e.g., depending on the number of suppliers and countries of origin).	

Table 5: Yearly minimum number of samples/tests for incorporation into "VLOG geprüft" quality of feed material not subject to compulsory labelling¹²

B 8 Specific Requirements for Private Labelling of Feed

B 8.1 Certification Status of Contract Manufacturers (KO)

Contract manufacturers are monitored as follows:

- contract manufacturer certification for all activities subject to certification under VLOG or a standard recognised as equivalent (to be checked at least once a year) or
on-site auditing of contract manufacturers as part of a VLOG audit of the private labeller by its certification body for all relevant activities (see Chapter A 3.2.1).

B 8.2 Contractual Agreement between Private Labeller and Contract Manufacturer (KO)

The private labeller and the contract manufacturer maintain a written agreement, which specifies the VLOG production processes and tasks that are the responsibility of the private labeller and the contract manufacturer. The agreement must list all process steps from procurement of raw materials to shipping.

If the contract manufacturer does not have its own VLOG certification, the agreement must obligate the contract manufacturer to comply with the current VLOG Standard and with auditing under A 3.2.1.

If the contract manufacturer has its own VLOG certification, the agreement must state that the contract manufacturer must promptly notify the private labeller if the certification becomes invalid.

B 8.3 Incoming Goods Inspection

If the private labeller (temporarily) takes physical possession of the manufactured feed, the incoming goods inspection must ensure that all "VLOG geprüft" feed meets the requirements.

Within the scope of the incoming goods inspection of VLOG-certified feed:

- the bills of lading or in the case of packed goods the packaging must be checked for "VLOG geprüft" identification.

¹¹ Exception will be mentioned in chapter E 4.9.1

¹² The transfer is only feasible for feed material that can be tested for GMOs

B 8.4 Sampling and Testing

If the private labeller (temporarily) takes physical possession of bulk goods, the “VLOG geprüft” feed must be subjected to risk-based sampling and GMO testing in accordance with Chapter B 5.2.

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The section below describes the specific rules and requirements for the Feed Stage and its sub-stages.

C 1 Stage Definition and Mandatory Certification

i *Explanation: VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found at https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard/Weitere_Dokumente/Als_gleichwertig_anerkannte_Standards.pdf*

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Feed manufacturing/processing: All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc. If a feed manufacturer also operates as a private labeller, the respective requirements of Part B must be met in addition to the requirements of Chapter C.			
All types of feed	For bulk and/or bagged/packaged produced in the business, that is used in the “ohne Gentechnik” production of food and is intended to be advertised as “VLOG geprüft”*.	For bulk and/or bagged/packaged feed material that is used in the “ohne Gentechnik” production of food and is <u>not</u> intended to be advertised as “VLOG geprüft”.	C 1-C 4, J 1
Mobile grinding and mixing facility: Commercial, multi-operation production of feed using mobile equipment in agricultural operations.			
Mixing/grinding of feed	For services rendered in “ohne Gentechnik” production that are to be advertised as “VLOG mixture”. Certification in this area also covers the trading/sale of oil used for dust control in the grinding and/or mixing facility.	For services rendered in “ohne Gentechnik” production that are not to be advertised as “VLOG mixture”.	C 1-C 3, C 6, J 1
Feed transport, feed storage/handling and feed trading are part of the Logistics Stage. The checklist for the Logistics Stage (see Annex 14) must be applied.			

* (Wording or seal according to Chapter A 1.2.2)

C 2 Details of the Certification Procedure

C 2.1 Audit Frequency

Routine audits are to be carried out annually.



Explanation: If a mobile grinding and mixing facility has a QS certification, the VLOG auditing interval for the grinding and mixing facility can, at the request of the business, be adjusted to match the audit interval under QS controls (max. 2 years).

C 2.2 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Risk management (C 3.3)
- Handling of non-compliant feed (C 3.7)
- Segregation of the flow of goods/exclusion of commingling (C 3.6)
- Traceability (C 3.8)
- Crisis management (C 3.11)

C 3 General Requirements

C 3.1 Facility Description

The facility description (Annex 15 (Feed Processing) or 17 (Grinding and Mixing Facilities) is on file and up to date.

The certification body and in case of matrix certification the matrix organiser are to be promptly informed about major changes pertaining to the VLOG certification.



Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents listed therein are to be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents/information specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

Major changes pertaining to the VLOG certification include, e.g., change of risk category, products and/or processes.



Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive

differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.

C 3.2 Assignment of Responsibilities/Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.



Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

C 3.3 Risk Management (KO)

Risk analysis

A documented risk analysis is to be in place for all relevant feed, procedures and processes, including risk evaluation for “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Feed for the “VLOG geprüft” area (incl. countries of origin)
- Risk grading of feed (risk-prone/not risk-prone) for the “VLOG geprüft” area



Explanation: An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Assessment_Aid_-_at_Risk_Feed.pdf.

- Handling of feed that meets the requirements for “VLOG geprüft” labelling and feed that does not meet the requirements for “VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions have been introduced and implemented for the identified risks based on the risk analysis.

C 3.4 Commissioning External Service Providers

If activities are outsourced to external service providers, the latter must be integrated into the business’ risk management system (see Chapter B 3.3).

For activities requiring certification (Chapter B 1, C 1, G 1) in the areas of feed manufacturing, transport, storage, handling that VLOG-certified businesses outsource to external service providers, an audit or certification of the service provider is to be performed in accordance with Chapter A 3.2.1.

C 3.5 Incoming Goods Inspection

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for “VLOG geprüft” production and/or labelling.

Incoming goods inspection of VLOG-certified feed

- The incoming goods inspection checks that the bills of lading or in the case of packed goods the packaging contain the “VLOG geprüft” label and/or the “VLOG geprüft” seal (see Figure 2). A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

Incoming goods inspection of risk prone feed not certified by VLOG

A supplier confirmation must be available for all feed, feed additives and processing aids that are classified by the business as risk-prone (see Chapter C 3.3). This can be achieved by:

- A separate declaration of the GMO-free status of the currently delivered batch/lot or
- A test result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered or
- An additional indication on the bill of lading declaring the products to be exempt from labelling or
- A clear contractual regulation regarding the delivery of feed exempt from labelling



Explanation: VLOG recommends the following wording for the declaration of non-VLOG-certified feed exempt from mandatory labelling: “The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”

Incoming goods inspection of non-risk-prone feed not certified by VLOG

For all feed, feed additives and processing aids graded as non-risk-prone by the business (see Chapter C 3.3), the respective delivery slip for the feed need not be labelled under Regulation (EC) Nos. 1829/2003 and 1830/2003.

C 3.6 Segregation of Goods Flows/Exclusion of Commingling (KO)

The physical and/or temporal separation of goods flows must ensure that feed that is not suitable for “VLOG geprüft” labelling at no time comes into contact with the goods flow for feed with “VLOG geprüft” labelling. Adequate procedural steps are to be in place to ensure that the carryover of GMO or non-compliant feed is reduced to an at least adventitious and technically unavoidable level. In addition, all feed must be clearly and consistently labelled in all process steps.

C 3.7 Handling of Non-Compliant Feed (KO)

An effective and documented procedure for handling non-compliant feed is to be in place.

At a minimum, it must include the following points:

- Labelling of the affected feed
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions

- Blocking and release of feed
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.



Explanation: Non-compliant feed must be identifiable, e.g. based on positive test results.

C 3.8 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed existing in the business/at the controlled site can be clearly identified at all times.
- The goods flow of “VLOG geprüft” feed as well as quantity lists and evaluations can be generated within one working day to allow conclusions about goods flows and their plausibility.



Explanation: For this purpose, the following data is to be determined, among others:

- *Information on supplier and delivery date*
- *Quantity*
- *Batch/lot formation, if applicable (including re-working)*
- *Information on delivery date and supplied customers*

C 3.9 Complaint Management

A documented system must be introduced to deal with complaints and feedback and comments 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 initiated for justified complaints and feedback.

C 3.10 Goods Recall

An effective and documented procedure for the goods recall, including determination of responsibilities, must be in place for non-compliant feed according to the VLOG Standard.

C 3.11 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 “VLOG geprüft” feed. This procedure must be implemented and includes at least:

- The steps to follow in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers

- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (see Annex 31), of the certification body and of affected business partners and customers
- Legal advice (if required)

The crisis management procedure is periodically tested internally, at least once a year, with regard to practicality, functionality and immediate implementation, with results documented.

C 3.12 Corrective Action/Ongoing Improvement Process

If non-compliant feed is 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 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 period. Both are to be documented.

C 3.13 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to the “VLOG geprüft” labelling process are to be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the lot + one year, but not less than two years.



Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, production and goods flow records (including re-work), training documents etc.

C 3.14 Staff Training

All staff members involved in operating procedures of relevance to “VLOG geprüft” labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity and at least once a year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.



Explanation: The intensity of training varies depending on the staff member and is to be oriented towards the responsibility of the staff member for the proper flow of the “VLOG geprüft” operating procedure.

C 3.15 Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business-specific Standard requirements of the Feed Manufacturing 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 units.

C 4 Specific Requirements for Feed Manufacturing/Processing

C 4.1 Reference Samples

The business consistently retains samples of all batches sent to customers, in suitable containers, so that a conclusion can be drawn as to the actually supplied quality, if necessary. The reference samples are retained for a period of time appropriate to the intended purpose and product perishability of the feed.



Explanation: This applies both to feed delivered in bulk and to packaged feed.

C 4.2 Sampling and Testing

Risk-based sampling and GMO testing is to be performed according to Chapter C 3.3 for the manufacture or labelling of relevant “VLOG geprüft” feed in accordance with the following specifications.

C 4.2.1 Sampling and Testing Plan

A written sampling and testing plan on the basis of the business-specific risk grading (see Chapter C 3.3) for feed in “VLOG geprüft” manufacturing is to be on file that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification)
- Frequency and periodic distribution of sampling and GMO testing
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and testing plan is to be implemented according to schedule.

Sampling and GMO testing is not required if the utilised feed cannot be tested for genetic engineering for technical reasons. In this case the test plan must provide for a risk analysis reaching the conclusion that it is not necessary to sample/analyse any raw materials/feed.



Explanation: The VLOG homepage offers an assessment aid on the suitability of feed for testing: http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf.

C 4.2.2 Sampling and Testing Frequency

The annual sampling and testing frequency in the business must at least follow the specifications listed in Table 6.

All samples to be tested must be processed in a VLOG-recognised laboratory.

Area	Sampling/GMO testing at “VLOG geprüft” incoming goods	Sampling/GMO testing at “VLOG geprüft” outgoing goods*
Sample material Production at site	Feed material	VLOG-certified feed
Production entirely not subject to compulsory labelling	For every batch of feed material graded as risk-prone	up to 10,000 t/year: 1 sample/test ≥ 10,000 to 50,000 t/year: 2 samples/tests ≥ 50,000 to 100,000 t/year: 4 samples/tests ≥ 100,000 to 200,000 t/year: 6 samples/tests ≥ 200,000 to 300,000 t/year: 8 samples/tests for every additional 100,000 t or part thereof: 2 additional samples/tests
Dual production	For every batch of feed material graded as risk-prone	up to 2,000 t/year: 1 sample/test > 2,000 to 5,000 t/ year: 3 samples/tests > 5,000 to 10,000 t/ year: 5 samples/tests ≥ 10,000 to 50,000 t/ year: 10 samples/tests ≥ 50,000 to 100,000 t/ year: 15 samples/tests ≥ 100,000 to 200,000 t/ year: 20 samples/tests ≥ 200,000 to 300,000 t/ year: 25 samples/tests for every additional 100,000 t or part thereof: 5 additional samples/tests

Table 6: Yearly minimum sampling/testing at the Feed Manufacturing sub-stage¹³

* Sites that only produce feed material not subject to compulsory labelling can dispense with sampling/GMO testing feed material if corresponding test was performed at the incoming goods point.

C 4.2.3 Handling of Positive Test Results

Positive feed test results are to be treated according to Annex 5.

The handling of the affected feed in the business must follow the specifications of Chapter C 3.7.

C 4.3 Outgoing Goods Control/Labelling on Bills of Lading

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging, using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2). It must be clearly evident to which feed item the labelling refers.

¹³ All feed quantities relate exclusively to feed that is either intended to be used in “VLOG geprüft” production and/or is labelled as “VLOG geprüft”, depending on the respective facility.



Explanation: VLOG recommends the following wording for the declaration of feed exempt from labelling and not certified by VLOG:

“The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”

C 5 Specific Requirements for Transport, Handling, Storage, Trading, Drop Shipping and Private Labelling of Feed

If the business performs activities in the area of transport, storage, handling, trading, drop shipping and private labelling of feed that are subject to certification, the relevant requirements according to Part B must be followed. The checklist for the Logistics Stage (see Annex 14) must be applied.

C 6 Specific Requirements for Mobile Grinding and Mixing Facilities

C 6.1 Specific Measures to Rule out Technically Avoidable Commingling

According to Chapter C 3.6, measures must be defined, documented and implemented for each facility to prevent the carryover of GMO feed from previous mixtures during the production of “VLOG mixtures”. Other risk factors such as *the age of the facilities and repairs* will be taken into account.

The proper facility operation has to be ensured. The facility must be cleaned in accordance with the business cleaning plan. Maintenance and cleaning are to be documented.

In grinding and mixing facilities that also process feed containing GMOs:

- at least one complete discharge and/or system purge must be performed following mixtures subject to compulsory labelling and before use in VLOG production – depending on the type of facility and internal risk assessment. Regardless of the operator’s risk assessment, a system purge must always be performed if more than 40 % of the previous mixture consisted of feed subject to compulsory labelling (based on total mixture weight). This is also required if a complete discharge has already been performed.
- the system purge must be performed in accordance with the manufacturer’s instructions and with a sufficiently large quantity. It must be reasonably evident to the auditor that the batch size was adequate (e.g. using the manufacturer’s information regarding carryover or the operator’s own test results).
- the system purges must be used outside of VLOG production.
- The method of complete discharges and/or system purges must be clearly documented.
- the performance of the complete discharge and system purge must be documented in the mixing protocol in accordance with Chap. C 6.3/Annex 30.

C 6.2 Safeguarding with a Carryover Test

Grinding and mixing facility operators must conduct a carryover test for all technically identical models used to validate the effectiveness of the measures taken against carryover. If there are several

technically identical models available in the facility, the test is to be conducted at the facility with the highest risk of carryover (e.g. measured by age or type/extent of repairs).

The carryover test must be performed when starting VLOG production and is then repeated at least every 5 years and when there are material changes to the facility (repairs, wear and tear, defects...), which (can) affect the carryover.

The test and its results are to be documented and retained at least until the next test. If necessary, the results can be used to derive appropriate measures.

The carryover test can be omitted in the following cases:

- The facility only grinds/mixes feed not subject to compulsory labelling
- A facility with a complete discharge performs both a complete discharge and a system purge in accordance with the manufacturer's instructions (or based on its own test results) after every mixture subject to compulsory labelling and before every "VLOG mixture"
- For new facilities, if there is a detailed system report from the manufacturer, which provides evidence-based information on the specific carryovers resulting from each measure (complete discharge, use of a hammer mill, system purge of a certain size/quality, etc.).

C 6.3 Mixing Documentation and Mixing Protocols

The sequence of the mixtures and the individual mixtures are documented daily for each facility. From the documentation it must be evident which mixtures are those with feed that is subject to compulsory labelling and which ones are "VLOG mixtures".

For mixtures subject to compulsory labelling, the percentage of feed subject to compulsory labelling in the mixture must be indicated.

After finishing the mixture, each "VLOG mixture" is to be documented with two mixing protocols according to Annex 30 or an equivalent mixing protocol and countersigned by the facility operator. The facility operator and the client each receive a copy of the mixing protocol.



Explanation: The documentation of the mixing sequence and the individual mixes may also consist of individual grinding and mixing protocols.

C 6.4 Sampling

C 6.4.1 Sampling Permission

- The operator of mobile grinding and mixing facility must have written permission from each VLOG- certified agricultural operation or agricultural VLOG group member.
- This authorises the operator of the mobile grinding and mixing facility to sample the manufactured "VLOG mixture".

C 6.5 Transportation of Feed or Trading of Feed

If the business performs activities in the area of transport, storage, handling, feed trading ~~or and~~ private labelling that are subject to certification, the relevant requirements according to Part B must be followed.

C 6.6 Identification on Bills of Lading

VLOG-certified mixtures of feed not subject to mandatory labelling must be labelled on all bills of lading using the wording "VLOG mixture".

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D 1 Definition

A matrix is defined as an association of different businesses/sites for the purpose of VLOG certification. The matrix is organised by a matrix organiser, while the participating businesses are referred to as matrix members, and their sites, as matrix sites. Matrix certification is available for businesses with at least two sites as well as for the joint certification of multiple businesses with their sites.

Matrix certification in the Logistics and Feed manufacturing Stage may be requested for the following six sub-stages:

- Transport of feed, raw materials and products
- Trade/drop shipping of feed, raw materials and products (incl. conversion of feed to “VLOG geprüft” quality)
- Storage/handling of feed, raw materials and products
- Private Labelling of feed
- Manufacturing/processing of feed
- Mobile grinding and mixing facilities

Several of these sub-stages may be combined in a single matrix certification.

Matrix members are subject to the corresponding requirements of Stage B and/or C. The specifications of this Chapter apply additionally.

D 2 Details of the Certification Procedure

D 2.1 Conditions and Requirements for the Certification

- Contract between the matrix organiser and a VLOG-recognised certification body
- Signed Standard Usage Agreement¹⁴ between the matrix organiser and VLOG



Explanation:

- *A matrix member can only be a member in one VLOG matrix for a specified activity area (e.g. Transport). If a member performs various activities (e.g. transport and trading or feed manufacturing and transport), the business can be a member in multiple VLOG matrices for each activity area. If a business is a member of a VLOG matrix, an independent single certification according to the VLOG Standard is not permissible for the same activity area.*
- *The “ohne Gentechnik”/“VLOG geprüft” labelling of feed, raw materials and products at one site is only permissible if the site was reported to the certification body in accordance with the requirements of Chapter D 2.2.1, the matrix organiser has performed the initial collection of data, if applicable, and the certification body has performed an audit at the site, if applicable, and the site has been approved by the certification body for the VLOG matrix.*
- *Only one certification body may be commissioned for the entire matrix certification. It is not permissible to retain multiple certification bodies for one matrix certification.*

¹⁴ Known as “Certification Agreement” until 20 June 2017.

D 2.2 Certification Procedure

The matrix certification for logistics and feed manufacturing is to occur in the following steps: (see Chapters D 2.2.1 to D 2.2.8).

- Application for certification made to a VLOG-recognised certification body and submission of the matrix description (see Chapter D 3.1), including risk grading of the sites.
- In case of the 33 %-process (see Chapter D 2.2.2): initial collection of data by the matrix organiser
- Audit planning by the certification body with the matrix organiser (scope, date/time, duration of audit)
- Audit performance at the matrix organiser and the matrix site according to Chapter A 3.7 by the auditor, incl. evaluation of requirements, review of risk grading
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
 - including confirmation of the approved sites
- Certification of the VLOG matrix for logistics and feed manufacturing

The described procedure is also to be applied to new matrix sites.

D 2.2.1 Application for Certification, Submission of the Matrix Description

The matrix organiser applies to the certification body for matrix certification in accordance with the VLOG Standard, and submits the matrix description (see Chapter D 3.1).

The matrix organiser determines the basis on which the VLOG initial certification and the future approval of additional sites will be carried out (see Annex 9):

- **33 %-process:** Initial data collection at matrix sites by the matrix organiser, together with audits by the certification body of the matrix organiser, at 100 % of feed manufacturers and 33 % of logistics sites (see Chapter D 2.2.2)

or

- **100 %-process:** Audit of the matrix organiser and all matrix sites by the certification body (see Chapter D 2.2.3).

The selected procedure of initial certification applies to the approval of new sites in a VLOG matrix for Logistics and Feed manufacturing. The certification body then updates the member and site list (see Chapter D 3.1).



Explanation: If the 33 %-process is selected, each site must be audited by the matrix organiser prior to being accepted.

Without an audit by the certification body, a logistics site (resp. mobile grinding and mixing facilities) can only be accepted if this 33 % criterion is still met after its acceptance within the respective calendar year. If this is not the case, a corresponding number of sites/applicants must be audited by the certification body prior to acceptance to meet this value. Newly added sites for feed manufacturing

(except mobile grinding and mixing facilities) always must be audited by the certification body prior to their acceptance.

Example: If eight logistics sites join the matrix in March, the matrix organiser conducts an initial survey of all, and the certification body conducts an initial audit of at least three. If an additional site joins the matrix in June of the same year (9th site), 33 % of the sites in this calendar year are already covered by the three sites audited in March (33 % out of 9 = 3). The new site can be included in the matrix without a certification body audit. If three additional sites are added to the matrix in October, one of them would have to be audited by a certification body (33 % out of 12 = 4).

D 2.2.2 Initial Certification Based on Initial Data Collection by the Matrix Organiser (33 %-process)

The certification body must perform an initial audit of the matrix organiser.



Explanation: This audit is generally done before the audits of the sites.

The matrix organiser performs the initial collection of data from all sites, i.e. on-site self-monitoring on the basis of the VLOG checklists by demonstrably competent personnel of the matrix organiser, and thereby verifies the information in the site-related facility descriptions of the individual sites. These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.

The matrix organiser subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories for each site.

The certification body reviews and evaluates the matrix description and the site-related facility descriptions of all matrix sites and the matrix organiser. Information/documents that are missing or must be corrected are to be requested from the matrix organiser.

Once all information/documents are available, the certification body will review the matrix organiser's results of the initial data collection from 100 % of feed manufacturers and at least 33 % of logistic sites (resp. mobile grinding and mixing facilities) by comparing them to its own initial audits.



Explanation: The certification body is responsible for ensuring a balanced distribution of the audits of the sites, considering the risk grading of the matrix organiser and e.g. size of the facility and organisation, geographic location, supplier, etc. If the certification body considers it necessary, it may also audit more than 33 % of the sites.

The certification body must compare the results of the initial data collections with its own results and will initiate whatever measures may be required.

The audit intervals for every individual site for the upcoming audit period are to be determined by the certification body. The certification body will also review the risk categories of the logistics sites.



Explanation: The certification body has the right not to accept the data collected by the matrix organiser and to conduct an audit of all sites. The decision must be justified in a verifiable manner.



Explanation: Annex 9 schematically shows the process of matrix certification.

D 2.2.3 Initial Certification on the Basis of 100 % Audits by the Certification Body (100 %-process)

As an alternative to Chapter D 2.2.2, all audits are to be performed by the certification body (see Annex 9):

The certification body must perform an initial audit of the matrix organiser.



Explanation: This audit is generally done before the audits of the sites.

The matrix organiser is to transmit the site-related facility descriptions of the sites to the certification body. The certification body performs VLOG audits in accordance with Chapter A 3.7 at the sites. Risk grading and the certification decision are to be reviewed based on the VLOG audit.

D 2.2.4 Effects of Audit Results on Labelling and Marketing

- If, due to the audit results, the certification of the VLOG matrix is suspended or revoked, the labelling of products with “VLOG”/“VLOG geprüft” is not permitted for any members of the VLOG matrix.
- The matrix may continue to market raw materials and products labelled “VLOG” and feed labelled “VLOG geprüft” even if individual sites were excluded from the matrix. In this case, the marketing of raw materials and products labelled “VLOG”/feed labelled “VLOG geprüft” will be prohibited only for the excluded former sites.

D 2.2.5 Certificate Issuance

The VLOG certificate will be issued for the VLOG matrix logistics and/or feed manufacturing and must contain the company name of the matrix organiser. The matrix organiser will also receive the list of sites from the certification body. For matrix certifications in logistics and feed manufacturing, the site list must contain the following for each matrix site:

- The defined risk category (for logistic sites)
- The last routine audit date

D 2.2.6 Issuance of Certificates for Matrix Members/Sites

The certification body may issue the facility a certificate stating that it is part of a VLOG matrix certification. This certificate, which lists the stage of the site, will state that the certificate is only valid as long as the facility is a member of the VLOG matrix and the matrix has a valid certificate.



Explanation: The matrix organiser’s permission is not necessary to issue the certificate. However, the competent certification body should inform the matrix organiser of the issuance of the certificate.

D 2.2.7 Change/Update of the Site List

The matrix organiser must report changes and/or updates to the site list (see Chapter D 3.1) to the certification body without delay.

D 2.2.8 Distribution of the Audit Report

For each audit, the matrix organiser and/or the audited site are to receive an audit report from the certification body including any deviations found and measures to be implemented.



Explanation: The audit report of the site is to be distributed to the sites via the matrix organiser or sent to them directly, depending on what was agreed beforehand.

D 2.3 Follow-up Certification and Monitoring/Audit Intervals

The matrix organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective actions at the sites.

In the case of logistics and feed manufacturing matrix certifications, the certification body is to perform an audit of the matrix organiser every year; for the matrix sites, audits at the intervals specified below. The audit interval commences as of the date the certificate is first issued.

Audit intervals of different sites:

- Feed manufacturing/processing sites must be audited annually by the certification body
- All matrix sites of the logistics and mobile grinding and mixing facilities stage must be audited by the certification body within 3 years.

If a follow-up audit is conducted sooner than necessary (e.g., one calendar year sooner), subsequent regular audits must also be scheduled sooner.

D 2.4 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Contractually binding of the members (D 3.2)
- Risk management (D 3.3)
- Handling of non-compliant feed, raw materials and products (D 3.6)
- Crisis management (D 3.9)

D 3 Requirements for Matrix Organisers

D 3.1 Matrix Description, Site List, Facility Description

Matrix description (see Annex 18)

The matrix organiser must submit a current matrix description to the certification body when applying for VLOG certification. The matrix organiser must promptly notify the certification body of major changes to the matrix description pertaining to VLOG certification.

The matrix description must contain/provide at least:

- A list of the matrix sites 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 the VLOG matrix, including the persons in charge and their contact data
- A list of all areas for which the matrix organiser is responsible (*e.g. risk management, sampling, testing etc.*)

- The persons in charge of matrix certification for the matrix organiser, including their contact information
- The basis used for the VLOG initial certification and the approval of additional sites in the future (100 % or 33 %-process)

Site list (see Annex 18)

The complete list of matrix sites and matrix members for matrix certification is to be on file and up to date. At a minimum, it must contain the following information:

- Address/clear identification of the site, official authorisation number, contact person and its contact information, name of business associated with the site.
- The defined risk category (for logistic sites)
- The last routine audit date
- Activity area (stage/sub- stage)

The matrix organiser will promptly notify the certification body of any changes to the site list.



Explanation: At the request of VLOG, the matrix organiser must promptly send the current list of sites to VLOG.

Facility description of sites

The matrix organiser is responsible for the facility descriptions of the sites and for keeping them up to date. There is one facility description for each site. The matrix organiser will notify the certification body promptly of any internal changes pertaining to certification. The certification body decides whether additional audits must be performed outside the regular intervals.



Explanation: Major changes pertaining to the VLOG certification include, e.g., changes to products and/or processes.

D 3.2 Contractual Binding of the Members (KO)

The matrix members/sites are to be contractually bound to the matrix organiser. The contract must contain at least the following items:

- Compliance with the VLOG Standard at the corresponding stage
- Specifications and duties under the individual risk management of the matrix
- Member obligation to implement the corrective actions ordered by the matrix organiser by the specified deadlines. The member must sign the agreement (declaration of participation).

D 3.3 Risk Management (KO)

Risk analysis

There is a documented risk analysis for all relevant feed, raw materials, products, procedures and processes, including risk assessment for “ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis includes at least:

- Feed, raw materials and products for the “ohne Gentechnik”/“VLOG”/“VLOG geprüft” area
- Handling of feed, raw materials and products that meet the requirement for “ohne Gentechnik”/“VLOG”/“VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “ohne Gentechnik”/“VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions have been introduced and implemented for the identified risks based on the risk analysis.

There must be an annual review of the risk management, including a review of the matrix description, e.g. as part of an internal audit.

D 3.4 Implementation of the Requirements for Sampling and Testing

Sampling and testing plan

The matrix organiser must submit a written sampling and testing plan for the matrix sites, which defines the risk-based sampling and GMO testing for risk-prone feed, raw materials and products of relevance for “VLOG”/“VLOG geprüft” processes in the business. The sampling and testing scopes can be found in the corresponding chapters of Parts B and C. The matrix organiser must ensure compliance with the sampling and testing plan. The various productions/processing technologies of the sites are to be taken into account when generating the sampling and testing plan.

The sampling and testing plan, in compliance with the requirements listed in Part J, must at a minimum contain/define the following:

- A written, documented risk analysis of the utilised/handled at-risk feed, raw materials and products, and the associated definition of the risk-prone feed (see Chapter C 3.3), raw materials and products to be sampled/tested
- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods 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.

Evaluation of the analytical data

The matrix organiser:

- collects the test results of the matrix sites, and evaluates these at least once per year. These evaluations must be conducted for each site.
- performs a site evaluation based on the evaluation results.
- defines risk-based measures for the sites as applicable.

Handling of positive test results

In case of positive GMO test results, the matrix organiser must initiate (corrective) measures according to Annex 5 (for feed) and Annex 6 (for food) as well as the provisions of Chapters B 5.2.3 or C 4.2.3.



Explanation: If collective samples from various batches/feed deliveries are tested, their results cannot be applied as single-operation test results.

Sampling and GMO testing is not required if the utilised risk-prone feed, raw materials and products cannot be tested for genetic engineering for technical reasons.

D 3.5 Staff and Member Training by the Matrix Organiser

All staff members of the matrix organiser involved in the operating procedures of relevance to “VLOG”/“VLOG geprüft” certification must 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. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

The matrix organiser must communicate all relevant requirements and information on “VLOG”/“VLOG geprüft” production to the members. Communication of the information is to be documented.



Explanation: Employees of the matrix organiser involved in relevant operating processes for “VLOG”/“VLOG geprüft” include, for example, QM, Procurement etc.

D 3.6 Handling of Non-Compliant Feed, Raw Materials and Products (KO)

The matrix organiser has to have an effective and documented procedure for handling non-compliant feed, raw materials and products in place. This includes at a minimum the following steps:

- Labelling of affected feed, raw materials and products
- Notification of customers/buyers, suppliers and matrix members
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.



Explanation: Non-compliant feed, raw materials and products must be identifiable, e.g. based on positive test results.

D 3.7 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 members and initiated for justified complaints and feedback.

D 3.8 Goods Recall

An effective and documented procedure for the goods recall, including determination of responsibilities, is to be in place for non-compliant feed, raw materials and products according to the VLOG Standard.

D 3.9 Crisis Management (KO)

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

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 “VLOG geprüft” feed or “VLOG” raw materials/products. This procedure must be implemented and includes at least:

- The steps to be followed in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency numbers
- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (see Annex 32), of the certification body and of affected business partners and customers
- 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.

D 3.10 Corrective Action/Continuous Improvement Process

If internal audits, external audits, or complaint management result in the identification of non-compliant feed and/or deviations from Standard requirements, the matrix organiser, if applicable together with the members, is to 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 period. Both are to be documented.

D 3.11 Documentation and Retention Periods

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



Explanation: Documents that must be retained are e.g. delivery slips, supplier evaluations, training documents, etc.

D 3.12 Internal Audit

The matrix organiser must perform annual internal audits, which at a minimum cover the general and business-specific Standard requirements of the matrix certification stage. The matrix organiser is subject to annual audits, which at a minimum cover the general and business-specific Standard requirements of the matrix certification 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 units.

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In the following part, the specific rules and requirements for the Agriculture Stage (incl. Animal Transport and Livestock Trade) and its sub-stages are described.

E 1 Stage Definition and Mandatory Certification

i *Explanation: VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG-certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found here: https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard/Weitere_Dokumente/Als_gleichwertig_anerkannte_Standards.pdf*

Sub-stage	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex 2	Standard requirements
Animal production: The production of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.			
Primary production of food of animal origin (e.g. milk, meat, eggs, honey, fish...)	For any agricultural operation (also members in VLOG group certifications according to Chapter F) that carries out primary production to be labelled as “ohne Gentechnik” and whose “ohne Gentechnik” production fulfils the following business sizes: <ul style="list-style-type: none"> • Apiary: ≥ 50 beehives • Egg-producing operations: ≥ 350 animal spaces • Milk production: annually ≥ 10 cows 	For any agricultural operation that carries out primary production to be labelled as “ohne Gentechnik” and whose “ohne Gentechnik” production fulfils the following business sizes: <ul style="list-style-type: none"> • Apiary: < 50 beehives • Egg-producing operations: < 350 animal spaces • Milk production: annually < 10 cows 	E 1-E 4, J 1 if applicable
Rearing of animals			
Rearing of laying hens	For agricultural businesses that sell pullets to the aforementioned primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the minimum	For agricultural businesses that sell pullets to the aforementioned primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the	E 1-E 4, J 1 if applicable

Sub-stage	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex 2	Standard requirements
	feeding conversion period, and that exceed if they fulfil the following business sizes: <ul style="list-style-type: none"> Rearing of laying hens: $\geq \leq$ 700 animal spaces 	minimum feeding conversion period, if they fulfil the following business sizes: <ul style="list-style-type: none"> Rearing of laying hens: < 700 animal spaces <i>A document check is necessary. *</i>	
Rearing of piglets	For agricultural businesses that sell piglets to the aforementioned primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following requirements are fulfilled: <ul style="list-style-type: none"> The facility is not registered with VLOG as a piglet rearing facility and business fulfils the following business size: \geq 250 animal spaces for piglets under 30 kg 	For agricultural businesses that sell piglets to the aforementioned primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled: <ul style="list-style-type: none"> < 250 animal spaces for piglets under 30 kg <i>A document check is necessary. *</i>	E 1-E 4, J 1 if applicable
		For agricultural businesses that sell piglets to the aforementioned primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following requirement is fulfilled: <ul style="list-style-type: none"> The facility is not registered with VLOG as a piglet rearing facility <i>Please contact the VLOG head office for information regarding registration.</i>	

Sub-stage	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex 2	Standard requirements
Rearing of cattle and other ruminants for dairy and meat production	<p>For agricultural businesses that sell gestating cows¹⁵ and/or dairy cows (as of second lactation) to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled:</p> <ul style="list-style-type: none"> • ≥ 20 animal spaces in ruminant rearing/maintenance of gestating cows 	<p>For agricultural businesses that sell <u>gestating cows and/or dairy cows (as of second lactation)</u> to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled:</p> <ul style="list-style-type: none"> • < 20 animal spaces in ruminant rearing/maintenance of gestating cows <p><i>A document check is necessary.*</i></p>	E 1-E 4, J 1 if applicable
		<p>For agricultural businesses that sell <u>young cattle and animals in first lactation</u> to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period.¹⁶</p> <p><i>Proof in accordance with Annex 2 is necessary (see Chapter E 4.6)</i></p>	
Rearing of other types of animals	For agricultural businesses that sell (young) animals to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and	<i>A document check is possible for very small facilities. Please ask the VLOG head office about the precise limits on facility sizes for individual types of animals.</i>	E 1-E 4, J 1 if applicable

¹⁵ Gestating cows: milk-producing animal (e.g. a cow) which is not milked for the time between two lactation periods.

¹⁶ VLOG is still discussing the certification obligation or alternative registration obligation for facilities that rear young cattle. Changes to the current procedure will be published in future versions of the Standard, if necessary.

Sub-stage	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex 2	Standard requirements
	whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period.		
* If an agricultural operation is smaller than one of the aforementioned business sizes, a document check is necessary. Please contact the VLOG head office in this regard.			
Plant-based production: The cultivation of primary products, including harvesting and foraging.			
Cultivation of feed	For the cultivation of feed used within the operation for the production of food of animal origin with the “Ohne Gentechnik” label.	For the cultivation of feed not used within the operation for the production of food of animal origin with the “Ohne Gentechnik” label.	E 1-E 3, E 5, J 1
Cultivation of food/raw materials		For the production of plant-based raw materials/food.	
Animal transport/livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transferring and resting, until the completion of unloading of the animals at the intended destination. As opposed to the exclusive carrier, a livestock trader (temporarily) owns the animals.			
	For livestock trade with VLOG animals		E 1-E 4, E 6

Sub-stage	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex 2	Standard requirements
	For animal transport of VLOG animals, if at least one of the three requirements on the right is not fulfilled	<p>Applies to animal transport, provided that all of the following three conditions are met:</p> <ul style="list-style-type: none"> • Commissioning by a VLOG certified business. • Transport is integrated into the risk management of the VLOG certified business. • An agreement is in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard. 	E 1-E 4, E 6
		Trade and transport of animals which have not yet begun the minimum feeding conversion period.	E 1-E 4, E 6

E 2 Details of the Certification Procedure

E 2.1 Criteria for Risk Grading in the Area of Animal Production

Risk grading by the auditor (see Chapter A 3.10) will be carried out according to the following criteria. In case different results are obtained using the different criteria for risk assessment, the business will be graded as belonging to the highest/strictest risk category.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> • No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site. • Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit. 	<p>Feed subject to compulsory labelling, which can be swapped, is present at the site.</p> <p>Grading in Risk Category 1 is only possible if installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling, which can be swapped, are completely segregated from the VLOG operating unit.</p>	<p>Following initial conversion to “ohne Gentechnik” production (or conversion to “ohne Gentechnik” production, possibly with a time lag), feed subject to compulsory labelling, which can be swapped and is handled with the same installations/feeding equipment/machines used for “ohne Gentechnik” feed manufacturing is present at the site¹⁷.</p>

¹⁷ This also includes the internal or external dual use of mixer vehicles for “ohne Gentechnik” production.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn	After the beginning of “ohne Gentechnik” feeding, no switch to feeding with feed subject to compulsory labelling takes place in the VLOG operating unit/in the VLOG barn.		After initial conversion to “ohne Gentechnik” feeding, feeding oscillates between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling (e.g. in production systems involving animals whose lifespan is longer than the “ohne Gentechnik” minimum feeding conversion period).
Certification status of risk-prone feed not subject to compulsory labelling used in “ohne Gentechnik” production (which do not fall under the exceptions in Chapter E 4.9.1)	Potentially risk-prone feed and feed suppliers (excluding see Chapters B 1, C 1) must be certified pursuant to the VLOG Standard or a standard recognised as equivalent. This also applies to oils used for dust binding in grinding and mixing facilities.		Potentially risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used. Potentially risk-prone feed is being used that has been certified pursuant to the VLOG Standard but lost the certification status due to a violation of the certification obligations in the supply chain (see Chapter B 1, C 1).
Use of: <ul style="list-style-type: none"> mobile grinding and mixing systems used by several businesses or stationary grinding and/or mixing facilities of agricultural selfmixers 	Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.	Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard or stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.	Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
		<p>Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:</p> <p>The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio¹⁸).</p> <ul style="list-style-type: none"> Measures to prevent carryover of GMO are described in the QM manual of the facility operator. 	<p>Grading into Risk Category 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT).</p>

¹⁸ Exception: If the VLOG farmer's organic-certified grinding and/or mixing facility of is used exclusively for organic-certified feed, the facility can be graded in Risk Category 0

E 2.2 Audit Frequency

Annual routine audits are carried out for individual certification of agricultural operations.

In the case of agricultural group certifications, audits are performed in accordance with Chapter F 2.4.

If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit, provided the following conditions are met:

- The animals are transported directly from the supplier to the buyer (e.g. slaughterhouse) without interim stabling and feeding

or

- Only animals with individual IDs may be unloaded or reloaded between the starting point and the transport destination (e.g. at a collection point) and the cattle trader/carrier does not feed VLOG animals.



Explanation: If an agricultural operation is certified as part of a VLOG group certification for one area and is individually certified for another area, the audit interval for the individual certification can be adjusted to match the group certification. In that case, the highest risk category for the operating units in the certified areas is to be used to calculate the audit interval.

Example: A facility is included in a group certification for the production of raw milk and is individually certified for beef. The entire facility falls into Risk Category 0. In this case, the audit interval for beef can be adjusted to match the audit interval for raw milk (max. 3 years).

E 2.3 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Handling of non-compliant feed, products and animals (E 3.5)
- Traceability (E 3.6)
- Crisis management (E 3.9)
- Incoming goods inspection (E 4.5, E 5.1, E 6.1)
- Compliance with the minimum feeding conversion period (E 4.6)
- Segregation of goods flows/exclusion of carryover from GMO feed, commingling and swapping (E 4.7, E 5.2, E 6.3)

E 3 General Requirements

E 3.1 Facility Description

The facility description in accordance with Annex 20 or 21 must be available and up to date.

The certification body and in case of group certification the group organiser are promptly informed about major changes pertaining to VLOG certification.



Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents and tests listed therein must be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and

documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description must be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

Major changes pertaining to VLOG certification include, e.g., change of risk category.



Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.

E 3.2 Assignment of Responsibilities/Organisational Chart

There must be an up-to-date organisational chart that:

- describes the organisational structure and
- lists responsibilities and substitution rules.



Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.

In the case of smaller facilities¹⁹, this may be done as part of the facility description.

E 3.3 Risk Management

Risk analysis

A documented risk analysis must be in place for all relevant facility-specific procedures and processes including assessment of the risks for “Ohne Gentechnik”/“VLOG” labelling.

The risk analysis must at a minimum cover the following points:

- Entry through feed subject to compulsory labelling
- Entry through feed from the grower's own cultivation
- Carryover and commingling through third parties
- Carryover within the business (e.g., via equipment or personnel)
- Multi-operation uses of machines, facilities / external service providers (see Chapter E 3.4)



Explanation: If the facility description addresses all points of the risk analysis, a separate risk analysis document will not be required.

Risk management

Detailed measures tailored to the business in question must be determined on the basis of this identification of the various sources of carryover and contamination. These measures must preclude the possibility of future contamination by, and carryover from, feed requiring a GMO declaration.

¹⁹ For definition see Glossary

The individual operative and risk-based procedural steps must be

- documented for each operation with separate proof of adequate spatial and temporal separation or logistical measures
- implemented accordingly and
- reviewed for efficacy as part of the self-monitoring process.

In any case, appropriate measures are required at the beginning of the feeding conversion to avoid carryover and commingling with GMOs, including all equipment, storage areas, facilities, mixing facilities, transportation means, etc. that come into contact with the feed.



Explanation: If in addition to the GMO-free feed other animals are fed in an agricultural operation with feed that must be labelled or which is grown in the vicinity of genetically modified crops, there is a strongly increased risk of carryover through residual feed, shared use of equipment, dust, etc.



Explanation: If the facility description covers all individual and risk-based procedural steps, a separate document will not be required.

E 3.4 Joint Use of Machines, Facilities/External Service Providers

- If machines/facilities for feed cultivation, feed processing and production are used jointly by several agricultural operations, and/or
- Tasks are outsourced to external service providers,

this is to be taken into account in the risk management (E 3.3) of the business, and corresponding process steps and measures to prevent GMO carryover are to be established. If measures are necessary to ensure compliance with the requirements of the VLOG Standard in case of shared machine use or subcontracted businesses, a separate compliance agreement must be signed with these businesses.

If activities subject to certification are outsourced to an external service provider (see Chapter B 1, C 1, G1, E 1), **an audit or certification of the service provider is to be performed in accordance with the requirements of Chapter A 3.2.1 must be met.**

E 3.5 Handling of Non-compliant Feed, Products and Animals (KO)

An effective and documented procedure must be in place for handling non-compliant feed, products and animals or positive test results or other findings regarding non-compliance with “ohne Gentechnik” requirements.

This includes at a minimum the following steps:

- Labelling of the affected feed, products and animals
- Notification of customers/buyers and suppliers
- 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 are to be defined in the procedure.

Positive feed test results are to be treated according to Annex 5.

For positive test results of unlabelled feed that is, however, clearly subject to compulsory labelling, the residual contaminated feed must be replaced or used outside the area dedicated to “Ohne Gentechnik” production once the erroneous labelling becomes known.

If a serious infraction of non-GMO feeding invalidating “Ohne Gentechnik” labelling occurred through faulty labelling of feed, the minimum feeding conversion period for the animals concerned must start anew, if applicable, shortened according to specific circumstances.



Explanation: Food which has already been marketed (e.g. milk with “Ohne Gentechnik” labelling) needs not be recalled.



Explanation: The severity of the infraction must be examined in each individual case by the respective certification bodies; it is influenced in particular by the following factors:

- *The farmer was aware that the feed should have been labelled according to Regulations (EC) No. 1829/2003 and No. 1830/2003*
- *Lack of due diligence at reception of feed*
- *Quantity of the wrongly declared feed that was actually fed*
- *GMO portion in the feed*
- *Time during which the wrongly declared feed was fed*

Explanation: A legal opinion of the law firm [GGSC] on behalf of VLOG offers additional orientation for businesses and the certification bodies concerning the decision as to whether a new start is required (Legal Opinion dated 23 November 2015 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/).

E 3.6 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All feed and “Ohne Gentechnik”/“VLOG” products and animals present at the facility that are associated with the “ohne Gentechnik”/“VLOG” label can be clearly identified at all times.
- The goods flow of “Ohne Gentechnik”/“VLOG” products and animals as well as quantity lists and evaluations can be generated within one working day to allow for conclusions about goods flows and their plausibility.



Explanation: For this purpose, the following data is to be determined, among others:

- *Information on supplier and delivery date*
- *Quantity*
- *Information on delivery date and supplied customers and business partners*

E 3.7 Complaint Management

Individual certification

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 initiated for justified complaints and feedback.

Group certification

Agricultural operations that are included in the group certification must inform the group organiser in the event of complaints and claims and coordinate corrective actions with the group organiser.

E 3.8 Goods Recall

An effective and documented procedure must be in place for the goods recall of non-compliant products or animals according to the VLOG Standard, including the definition of responsibilities.



Explanation: No goods recall procedure is needed for products and animals that cannot be taken back (e.g. raw milk, eggs).

E 3.9 Crisis Management

Individual Certification

In the event of an incident, the agricultural business must notify the competent certification body. Further measures will be agreed upon between them.

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 “VLOG geprüft” feed or “Ohne Gentechnik”/“VLOG” raw materials/products. This procedure including the contingency plan must be implemented and must comprise at least:

- The steps to follow in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (see Annex 33), of the certification body and of affected business partners and customers

Group Certification

For agricultural operations that are included in a group certification, the group organiser would take over crisis management (see Chapter F 3.10). In the event of an incident, the agricultural operation must notify the group organiser. Further measures will be agreed upon with the group organiser.

E 3.10 Corrective Action

If non-compliant feed, products or animals are identified within the scope of internal audits, external audits or complaint management and/or deviations from Standard requirements, the business 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 period. Both are to be documented.

E 3.11 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to "ohne Gentechnik" production are to be retained for at least the following period, unless statutory provisions require a longer retention period: five years.



Explanation: Documents that must be retained include bills of lading, invoices for operating materials (e.g. seeds), feed accompanying documents, training documentation, orders, declarations, etc.

E 3.12 Staff Training

All staff involved in the operating procedure of the "VLOG" sector shall be trained concerning the requirements of the VLOG-Standard and the operating procedures laid down therein. Training shall take place before they take up their activity as well as on a continuous basis at least once a year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.



Explanation: For small agricultural operations (see Glossary), there is no need for separate "VLOG" training for employees.

Training may take place in the form of practical instructions. The intensity of training varies depending on the staff member and is to be oriented towards the responsibility of the staff member for the proper flow of the "VLOG" operating procedure.

E 3.13 Self-monitoring

An internal self-monitoring is to be performed once per year. During this monitoring, the facility description will be checked and updated as appropriate. The monitoring and results must be documented.

E 4 Specific Requirements for Animal Production

E 4.1 Animal Inventory

All animal species or animal categories kept in the business for food production are recorded in a current livestock overview. This must include whether these animals are fed in accordance with the "ohne Gentechnik" Standard or not.

E 4.2 Feed Ordering

Risk-prone feed that is not VLOG certified (see Chapter E 4.9.1) for “VLOG” production must be ordered in writing, stating the following aspects:

- Animal species/Animal category
- Feed type/designation
- Reference to feed quality not subject to compulsory labelling or use for the production of food labelled as “ohne Gentechnik”/“VLOG”

As an alternative to ordering feed in writing, for feed relevant for “VLOG” production there must be:

- a written agreement with the supplier that the feed supplied is suitable for production of “ohne Gentechnik”/“VLOG” labelled food and not subject to compulsory labelling



Explanation: The agreement must comprise at least the names and addresses of the businesses involved and the name of the feed(s) included in the agreement.

- Or additional information of the feed supplier on the bill of lading/delivery slip with the following wording:
“The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”



Explanation: Non-risk-prone feed (see Chapter E 4.9.1, e.g. VLOG certified feed bearing a reference to and/or the “VLOG geprüft” seal) may be used without written orders, without additional contractual agreement and without other accompanying documents.

E 4.3 Feed List

An up-to-date feed list must be available, in which all feeds used in the business, their origin as well as their intended use (animal species/animal category) are indicated.



Explanation: The feed list serves as an aid for ensuring “Ohne Gentechnik” feeding:

- *The list may serve as a basis to verify and ensure that appropriate certificates are at hand for every delivery of feed, certifying that this feed is not subject to compulsory labelling.*
- *Identification of overlaps in the purpose of feed for different animal species. This is decisive especially when feeding with feed not subject to compulsory labelling occurs at the agricultural operation simultaneously with feed that is subject to compulsory labelling. These are to be labelled “interchangeable”.*

The feed list must initially be drawn up within the scope of a first assessment. After that it must be kept up to date by adding new feeds and new suppliers, and by deleting those that no longer exist. However, the latter may only be done once the respective feed has been fully consumed and is no longer present on the premises. Additions and deletions must be noted with the date of the first purchase or the date of the last consumption. All self-produced feed shall also be entered in the feed list.

An alternative for small businesses²⁰ is a feed list realised by chronologically filing invoices and bills of lading.

E 4.4 Feed Rations

Current feed rations for all animal species and animal categories of “Ohne Gentechnik” production must be documented, taking into account differences in life phases or season.

E 4.5 Incoming Goods Inspection of Feed (KO)

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for “Ohne Gentechnik” production.

Incoming goods inspection of bulk VLOG certified feed:

- When bulk feed is received, the accompanying bills of lading must be checked for the “VLOG geprüft” label. A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once annually.

Incoming goods inspection of bagged VLOG certified feed:

- All bags must be checked for the “VLOG geprüft” label.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once annually.



Explanation: Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification.

Incoming goods inspection of feed not certified by VLOG:

- The waiver of labelling in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003 on feed labels or bills of lading must be examined.

All bills of lading for purchased feed must be reviewed for completeness of the information provided and filed in chronological order.

E 4.6 Compliance with the Minimum Feeding Conversion Period (KO)

Before food from animal sources (meat, milk, eggs) can be labelled “VLOG” or with the “Ohne GenTechnik” seal an exclusive “ohne Gentechnik” feeding regimen must be followed for the minimum feeding conversion period defined for each animal species and intended use according to Table 7. The process for complying with the minimum feeding conversion period must be described.

²⁰ Definition see glossary

Animal species	Period
Equids and cattle (including water buffaloes and bison species) for meat production	twelve months and in any case at least three quarters of their life
Small ruminants	six months
Pigs	four months
Milk-producing animals	three months
Poultry intended for meat production put in barns before the age of 3 days ²¹	ten weeks
Poultry for egg production	six weeks
Other animal species/categories	from the time of birth/hatching

Table 7: Minimum feeding conversion period according to EGGenTDurchfG (see EGGenTDurchfG, most recently amended by Art. 58 V of 31 August 2015 | 1474)

Ensuring the aforementioned minimum feeding conversion periods within the business is to be verified by means of the feed list (see Chapter E 4.3) and feed bills of lading/cultivation records.

If an animal was fed with feed subject to compulsory labelling during or after the minimum feeding conversion period, the conversion period must start anew for this animal (see Chapter E 3.5).

Purchase of animals from VLOG certified previous owners

For the “ohne Gentechnik”-compliant feeding period at the previous owner to count:

- There must be a written confirmation, including date, of the time from which the animals verifiably were consistently given “ohne Gentechnik”-compliant feed until their sale and
- The VLOG certification (or certification recognised as equivalent) of the previous owner must be checked regularly, at least once per year.

Purchase of animals from previous owners who are not VLOG-certified

Animals may be purchased from non-VLOG-certified previous owners only if:

- the “ohne Gentechnik”-compliant feeding period at the previous owner’s facility will not be applied to the minimum conversion feeding period (i.e. the complete minimum conversion feeding period will be ensured at the buyer’s VLOG facility) AND/OR
- the rearing facility under E 1 is not subject to a certification obligation.

In general, the “ohne Gentechnik”-compliant feeding period at the non-VLOG-certified previous owner’s facility may only be applied if written confirmation by the previous owner is available in accordance with Annex 2.

²¹ The minimum feeding conversion period for poultry for meat production in the table given above is equivalent to a flat period of ten weeks prior to slaughter, not including the first three days of life.



Explanation: As an alternative to the use of Annex 2, a contractual agreement can be concluded with the previous owner who is not VLOG-certified for “ohne Gentechnik”-compliant feeding (including appropriate measures).

This agreement must include at least the following:

- *There must be a documented procedure for tracing the time from which individual animals were given “ohne Gentechnik”-compliant feed. The functionality of the procedure must be verifiable by third parties.*
- *The following addendum must be included: “The previous owner authorises Verband Lebensmittel ohne Gentechnik (VLOG) to verify the accuracy of the information on “ohne Gentechnik”-compliant feeding, using on-site controls through random sampling or if there are reasonable suspicions and to take samples for testing purposes. These inspections may be carried out by third parties on behalf of VLOG.”*
- *Changes/corrections must be promptly reported to the relevant facility.*

E 4.7 Segregation of Goods Flows/Exclusion of Carryover from GMO Feed, Commingling and Swapping (KO)

Feed of different qualities:

If feed subject to compulsory labelling is (temporarily) available in the business, the following requirements must be met:

- The agricultural operation does not carry out any conventional production of the same animal category with feed subject to compulsory labelling parallel to “Ohne Gentechnik” production.
 - Permissible exception: The different productions take place in completely different operating facilities, which also involves completely separate storage and handling of feed.
- The facility's individual measures specified in Chapter E 3.3 must ensure in a traceable manner that at no time feed that requires labelling can make its way into the flow of feed intended for the production of “Ohne Gentechnik” food.
 - The flows of goods are segregated spatially and/or temporally.
 - In the case of temporal segregation, it must be ensured by suitable process steps that any carryover of GMO is reduced to a technically unavoidable minimum. Before beginning the “ohne Gentechnik” feeding – especially in case of frequent switching between “ohne Gentechnik” feed and feed subject to compulsory labelling – the measures determined according to Chapter E 3.3 are to be carried out and documented. It must also be documented where any residual quantities of feed that requires labelling were moved to.



Explanation: Vehicles, for example, must be verifiably dry cleaned after having transported bulk feed subject to compulsory labelling.

- Furthermore, in the case of temporary segregation in the handling of feed subject to compulsory labelling and feed not subject to such labelling for “Ohne Gentechnik” production intended for production of food marked „VLOG” or with the “Ohne GenTechnik” seal, the effectiveness of the measures must be proved by means of representative testing results.

If interchangeable feed subject to compulsory labelling is available, the following additional requirements must be complied with:

- Feed subject to compulsory labelling which can be swapped must be labelled with the intended use (animal category to which the feed is intended to be fed).
- In an operating unit there is no parallel use of feed not subject to compulsory labelling for “Ohne Gentechnik” production and swappable feed that is subject to such labelling whose purpose is not clearly defined or which can be used in several ways for a number of animal categories (e.g. soy bean meal as feed material).



Explanation: The presence of feed the suitability of which for “ohne Gentechnik” feeding is not ensured is permissible if the intended use thereof and the segregation from areas dedicated to “Ohne Gentechnik” production is clearly documented. For example, conventional complete or supplementary feed for breeding sows in an operation where dairy cattle are fed “ohne Gentechnik” feed does not pose a problem.

If feed mixer vehicles are used internally or externally for both feed subject to compulsory labelling and feed not subject to compulsory labelling, appropriate measures for avoiding carryover/commingling must be taken. At least one sufficient system purge or wet cleaning must be carried out between feed subject to compulsory labelling and feed for “Ohne Gentechnik” production. The system purge is to be used outside of “Ohne Gentechnik” production.

Products of different qualities:

If the business simultaneously handles “Ohne Gentechnik”/“VLOG” products it produces itself and products not suitable for the “Ohne Gentechnik” system, 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.

E 4.8 Use of Grinding and Mixing Facilities

E 4.8.1 Joint Use of Grinding and Mixing Facilities

E 4.8.1.1 Contractual Agreement with the Facility Operator

For use of grinding and mixing facilities that are VLOG-certified or certified under a standard recognised as equivalent:

- the operator of the mobile grinding and mixing facility must have written permission from each VLOG certified agricultural operation or agricultural VLOG group member. This authorises the operator of the mobile grinding and mixing facility to sample the manufactured “VLOG mixture”.
- The VLOG certification of the grinding and mixing facility is checked regularly, but at least once a year.

For use of mobile mixing and grinding facilities that are not VLOG-certified or certified under a standard recognised as equivalent, there must be a written agreement between the farmer and the facility operator which covers the following points:

- The facility operator's commitment to scheduled maintenance and cleaning of the respective facility as well as its use according to the operating manual

- Obligation to perform at least a complete discharge and/or system purge following mixtures subject to compulsory labelling and before use in VLOG production, depending on the facility type and internal risk assessment. The complete discharge and/or system purge ensures that the feed will not be subject to compulsory labelling as a result of using the facility. The measure can be substantiated by a facility report/attestation by the facility manufacturer, for example. Regardless of the operator's risk assessment, a system purge must be performed whenever the previous mixture was composed of more than 40% feed subject to compulsory labelling (relative to total mixture weight). This is mandatory even if a complete discharge has already been performed.
- Obligation to carry out the system purge according to the manufacturer's instructions and in a sufficiently large quantity.
- Commitment to document the grinding and mixing processes carried out based on the grinding and mixing protocol according to Annex 30 or an equivalent mixing protocol.
- When purchasing oils/fats from facility operators: commitment to use oils/fats not subject to compulsory labelling for "Ohne Gentechnik" production

E 4.8.1.2 Specific Measures to Eliminate Carryover of GMO Feed

The business must define measures in accordance with Chapter E 3.3 to prevent the carryover of GMO feed through the use of mobile grinding and mixing facilities. These measures are to be implemented, documented and checked for effectiveness within the scope of self-monitoring. If system purges from the mobile grinding and mixing facility remain, it is to be ensured that they are not used for "Ohne Gentechnik" production.

E 4.8.1.3 Documentation of Feed Mixture

For each grinding and mixing process for the "Ohne Gentechnik" production, a grinding and mixing protocol according to Annex 30 or an equivalent mixing protocol is to be prepared that is completely filled out and signed by the facility operator.

E 4.8.2 Use of Stationary Grinding and Mixing Facilities

E 4.8.2.1 Use of Grinding and Mixing Facilities Exclusively for Feed Not Subject to Compulsory Labelling

The exclusive use of feed not subject to compulsory labelling/"VLOG geprüft" feed must be documented in the facility description.



Explanation: If a grinding and mixing facility is used exclusively for feed not subject to compulsory labelling/"VLOG geprüft" feed, there are no further requirements.

E 4.8.2.2 Dual Use of Grinding and Mixing Facilities for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling

If the grinding and mixing facility is used for both feed not subject to compulsory labelling/"VLOG geprüft" feed and feed subject to compulsory labelling, the conditions specified in the following chapters must be met.

E 4.8.2.3 Specific Measures to Eliminate Carryover of GMO Feed

Individual measures/requirements are to be derived, documented and implemented according to Chapter E 4.7 for each facility to prevent the carryover of GMO feed from previous mixtures during the production of mixtures for the "Ohne Gentechnik" production. Other risk factors such as *the age of the facilities and repairs* will be taken into account.

The proper operation of facilities must be ensured. Each facility has to be cleaned in accordance with the business's cleaning schedule. Maintenance and cleaning are to be documented.

The following applies to the performance of system purges and complete discharges:

- At least one complete discharge and/or system purge must be performed after processing mixtures subject to compulsory labelling and before using the equipment for VLOG production, depending on the facility type and internal risk assessment. Regardless of the operator's risk assessment, a system purge must be performed whenever the previous mixture was composed of more than 40 % feed subject to compulsory labelling (relative to total mixture weight). This is mandatory even if a complete discharge has already been performed.
- The system purge must be carried out in accordance with the manufacturer's instructions and in a sufficiently large quantity. The batch size must have a transparent basis (e.g. manufacturer's specifications regarding carryover or own test results).
- System purges are to be used outside of VLOG production.
- The manner in which complete discharge or system purges are performed has to be clearly documented.
- Removal of residues and purging are to be documented in the mixing protocol according to Annex 30.

E 4.8.2.4 Documentation of Feed Mixture

The sequence of the mixtures and the individual mixtures are documented daily for each facility.

The documentation must clearly distinguish between mixtures containing feed that is subject to compulsory labelling and "VLOG mixtures".

Each completed "VLOG mixture" must be documented with a mixing protocol according to Annex 30 or an equivalent mixing protocol. This document is to be countersigned by the person preparing the mixture.

E 4.9 Sampling and Testing

This chapter is not relevant for businesses of the sub-stage Animal Transport and Livestock Trade.

In the business, risk-based sampling and GMO testing of risk-prone feed relevant for "Ohne Gentechnik" production is to be carried out in accordance to the following principles.

E 4.9.1 Risk-prone Feed

The following feeds are graded as risk-prone for the Agriculture Stage:

- Feed material from plant species such as soy, rapeseed/canola, maize/corn²², sugar beet²³, cotton, except:
 - Feed from plant species that are certified in accordance with the VLOG Standard or a recognised VLOG equivalent standard; and/or
 - Feed from plant species that directly originate from a producer from a cultivation country where the cultivation of genetically modified plants is prohibited and the feed was neither processed by third parties nor transported by a commercial shipper
- Compound feed produced from one or more of the feed materials mentioned in Chapter E 4.9.1, except:
 - Compound feed that is certified in accordance with the VLOG Standard or a recognised equivalent standard

E 4.9.2 Sampling and Testing Plan

In individually certified businesses, a written sampling and testing plan must be available that describes the risk-based sampling and GMO testing of risk-prone feeds relevant for “Ohne Gentechnik” production in the business.

In compliance with Part J, the sampling and testing plan must at least 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 (see Chapter E 3.3).
- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing

²² Dried maize/corn grains that can be proven to have been cultivated in Denmark, Germany, France, Greece, Italy, Croatia, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Northern Ireland, Austria, Poland, Scotland, Switzerland, Slovenia, Hungary, Wales, Belgium or Cyprus can be classified as feed that is not risk-prone. This presumes the farmer obtains the maize/corn directly from the drying facility and a meaningful confirmation that only goods not subject to compulsory labelling were dried at the facility, including maize/corn produced in only these countries, is provided.

Traded maize/corn silage made of maize/corn that was demonstrably cultivated in the above-mentioned countries can also be classified as feed that is not risk-prone. This option applies if the farmer obtains the feed from a drop shipper and the delivery proceeds directly from the producer to the customer without intermediate storage OR the maize/corn is obtained from a trader that exclusively stores/handles maize/corn silage that originates from the above-mentioned countries (certification from trader required) OR it is silage that was foil-wrapped/shrink-wrapped by the producer and is delivered to the farmer in this original packaging by a trader. In any case, a conclusive batch-specific certificate of origin/declaration by the drop shipper/trader or producer must be submitted to the farmer.

²³ Feed produced from sugar beet (e.g. sugar beet chips, pellets, molasses) which can be proven to have been cultivated and, if applicable, processed in the EU or Switzerland are not graded as risk-prone feed if the farmer has conclusive confirmation from the manufacturer for each shipment confirming that the goods are feed produced from sugar beet that was cultivated and processed in the EU or Switzerland. This exception applies only for feed in which sugar beet is the only risk-prone feed component. This option applies if the farmer obtains the feed directly from the manufacturer OR the farmer obtains the feed from a drop shipper and the delivery proceeds directly from the manufacturer to the farmer without intermediate storage.

- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test plan (contracted laboratory, scope of testing).

The sampling and testing plan is to be implemented according to schedule.



Explanation: Sampling and GMO testing are not necessary if the risk-prone feed cannot be analysed for genetic engineering for technical reasons. The VLOG homepage offers an assessment aid on the suitability of feed for testing:

http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf.

E 4.9.3 Sampling and Testing Frequency, Retention of Reference Samples

Sampling frequency:

Sampling must take place in the following cases:

- At every delivery of risk-prone feed material and compound feed²⁴
- When using a stationary or mobile grinding and mixing facility in accordance with the guidelines in Table 8
- After every change from “ohne Gentechnik” feeding if the VLOG business facility/VLOG barn regularly switches between “ohne Gentechnik” feed and feed subject to compulsory labelling. The corresponding sample must be taken before or at the beginning of the minimum feeding conversion period and at the location where the feed is provided.



Explanation: Sampling of bagged goods (including tamper-resistant and sealed Big Bags) on delivery is not required.

Retention of reference samples:

The reference samples of the samples taken must be retained for at least two months. In addition, for each of the two relevant categories²⁵, at least the three most recent reference samples must always be retained, even if they are more than two months old.

Test frequency

All samples to be tested must be processed in a VLOG recognised laboratory.

GMO testing of the sampled feed and feed mixtures must take place in accordance with the test plan and the requirements set out in Part J:

- at least once in each audit interval from the feed (delivery of risk-prone feed) or the mixed/ground feed (from a non-certified grinding and mixing facility) with the highest risk

and also

- after every switching to “ohne Gentechnik” feeding, if a VLOG operating unit/VLOG barn regularly switches between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling.

²⁴ This also applies to the additional purchase of feed from grinding and mixing facility operators

²⁵ Delivery of risk-prone feed; switch between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling



Explanation: A switch to “ohne Gentechnik” feeding will take place, for example, in a production system where the lifetime of the animals is longer than the “ohne Gentechnik” minimum feeding conversion period (e.g. turkey fattening facility).

If collective samples of feed are analysed, the results may not be factored as test results pertaining to individual operations. For each agricultural operation at least one test result that refers to a specific delivery of risk-prone feed material or compound feeds or mixtures of grinding and mixing facility is to be produced in each auditing interval.



Explanation: VLOG operating units/VLOG stables are exempt from feed change tests where a documented wet cleaning of the stable and feed infrastructure (incl. silos) is performed before “ohne Gentechnik” feeding.

Mobile and stationary grinding and mixing facilities

In the respective audit interval, at least the testing frequencies listed in Table 8: Minimum number of tests in the sub-stage mobile/stationary grinding and mixing facility in the respective audit interval must be implemented in the business.

The samples have to be taken from the mixed/ground feed.

	The mobile grinding and/or mixing facility is VLOG certified²⁶	The mobile grinding and/or mixing facility is not VLOG certified	Stationary grinding and/or mixing facility (only for feed used within the farm)
Facility exclusively processes feed not subject to compulsory labelling	Sampling and testing not required	1 test result per audit interval	Sampling and testing not required
Facility also processes feed subject to compulsory labelling	Sampling and testing not required		1 test result per audit interval OR Farmer performs a carryover test on the facility every 5 years (see Chapter C 6.2)

Table 8: Minimum number of tests in the sub-stage mobile/stationary grinding and mixing facility in the respective audit interval

E 4.9.4 Reduction of the Scope of Testing after Feed Switching in Group Organisations:

If the business regularly switches from “ohne Gentechnik” feeding to feeding with feed subject to compulsory labelling and participates in the VLOG system via a group organiser, the scope of testing may be reduced under the conditions explained below. The reduction refers exclusively to testing after

²⁶ Or in accordance with a recognised VLOG-equivalent standard

feed switching; the number of tests required for incoming goods or when using grinding and mixing facilities must not be reduced.

- Before the scope of testing can be reduced, the functionality of the switching system must be documented by the group:
 - At least one test result from switching must be available for each site with regular feed switching. The test results must come from a current feeding system and meet the requirements of the current VLOG Standard.
 - After receiving the test results and, if necessary, other documents, the certification body will decide whether the group may claim the reduced scope of testing. The decision must be documented.
- The switching system must be continuously validated:
 - At least one test after each feed switching must be carried out annually in at least 25 % of the sites with regular feed switching.
 - At least one sample must be taken annually by a VLOG certification body from at least 5 % of the sites with regular feed switching after such feed switching has been carried out, and must be included in the test. These tests can be counted towards the 25 %.
 - Each switching, including any measures taken to avoid commingling and carryover must be documented in writing.



Explanation: A flow chart of this process is available in Annex 7.

If new businesses/sites join the group and also wish to take advantage of the reduced scope of testing, at least one test result of feed switching must be submitted for each new site.

In the event of positive test results, the certification body (if necessary upon agreement with VLOG) will decide in each individual case whether an individual business or the entire group may continue to use the reduced scope of testing.

E 4.10 Inspection of Outgoing Goods/Labelling on Bills of Lading

It must be ensured that only such products and animals that meet in full the requirements for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal (products) leave the business.

VLOG certified products/animals must be labelled for each individual product/animal and/or group on all bills of lading using the wording “VLOG” or the “Ohne GenTechnik” seal.

If no waybills/bills of lading are produced due to the nature of the system (e.g. milk collection), an unequivocal contractual regulation is to be made concerning delivery which ensures the above-mentioned labelling.

E 5 Specific Requirements for Plant-based Feed Manufacturing

E 5.1 Incoming Goods Inspection (KO)

At goods receiving it must be ensured that all seeds and seed stock for the production of feed to be used within the business is GMO-free.

The feeds produced internally must be documented in the feed list (see Chapter E 4.3).



Explanation: The GMO-free nature of the seeds and plant material is achieved, for example, by the absence of a label in accordance with Directive 98/95/EC on seed documents/declarations.

E 5.2 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

GMO carryover from GMO cultivation and/or GMO experimental releases into feed produced internally must be prevented. It must be periodically verified whether GMO cultivation or GMO experimental releases are taking place in the immediate vicinity of the fields and it must be evaluated whether this is affecting the operation's own crops and, if applicable, whether corresponding cultivation distances are met.

These individual and risk-specific process steps must be documented for each operation with a separate proof of adequate logistical measures (e.g. spatial, temporal separation) and their efficacy reviewed as part of the self-monitoring process.



Explanation: If the facility description contains all points, no separate document will need to be created.

E 6 Specific Requirements for Animal Transport/Livestock Trade

In the case of livestock traders/animal carriers, the requirements of Chapter E 4 and this chapter are checked in addition to the general requirements of the Agriculture stage.

E 6.1 Incoming Goods Inspection of Animals (KO)

At goods receiving it must be ensured that all VLOG animals meet the following requirements:

- “VLOG” quality is to be confirmed for every delivery by the supplier on the waybills/animal transport documents for each individual animal and/or group.
- For every delivery operation, the VLOG certification and/or incorporation into a group certification (written verification by the certification body of the group organiser) for the area of applicability of the animal species/animal category is to be verified in a risk-targeted manner (at least at initial purchase and then annually).

E 6.2 Risk Management

Besides Chapter E 3.3, the risk management including the risk analysis must consider the following points:

- Separate handling of VLOG animals and non-VLOG animals
- If applicable: handling of feed subject to compulsory labelling and feed that is not
- Other business-specific items as necessary



Explanation: In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with “ohne Gentechnik” it is only permissible to use feed not subject to compulsory labelling.

E 6.3 Segregation of Goods Flows/Exclusion of Commingling and Swapping of Animals (KO)

The risk-targeted process steps for ensuring the Standard requirements are to be documented for each operation with a separate proof of adequate spatial, temporal or logistical measures and their efficacy reviewed as part of the self-monitoring process.

VLOG animals

VLOG animals are always conveyed and/or transported separately from animals that are not VLOG certified. The following exceptions are possible:

- Animals/animal categories with identification of individual animals (e.g., cattle ear tags with a unique ID number for each animal):
 - When accepting animals, the animal identification must be checked; only properly identified animals are accepted.
- Animals with farm identification (e.g., pig ear tags specifying the agricultural operation's VVVO number):
 - If only animals that are verifiably VLOG animals are accepted with a transport from an operation, the operation identification of the animals serves as sufficient verification of segregation.

If both VLOG animals as well as animals of other qualities are accepted with a transport from an operation, the different groups must be verifiably segregated during transport/conveyance. The segregation measures must be documented in the transport documents.



Explanation: The unique individual animal identification serves as sufficient verification of segregation.

All employees must be aware of the VLOG status of the individual animals, from acceptance through conveyance/transport, to final delivery.

Part F: Group Organisation Agriculture

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In the following part of the Standard, the group certification process in agriculture and the requirements and specifications for group organisation in agriculture are described.

F 1 Definition and Certification Obligation

The requirements for the Agriculture Stage (Part E) must apply to agricultural group members. Additionally, the requirements in Part F must apply to the agricultural group organiser. The audits review whether all requirements have been met by the agricultural group organiser and the agricultural group members.

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
VLOG agricultural group: A VLOG agricultural group is a combination of at least two agricultural operations (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture.			
Agricultural group organiser, hereinafter group organiser: Businesses in a VLOG agricultural group having responsibility for a risk management covering agricultural group members and, for the production of food products of animal origin, also including PCR tests of the feed employed. In VLOG agricultural group certification, certification is done through the group organiser, i.e. the group organiser receives the certification for the VLOG agricultural group.			
	Food of animal origin	Plant-based food	F 1-F 3
Agricultural group member, hereinafter group member: Agricultural operation which is contractually integrated into a VLOG agricultural group.			
	For the production and processing of food of animal origin.	For the production of plant-based food.	E 1-E 5

F 2 Details of the Certification Procedure

F 2.1 Conditions and Requirements for the Certification

- Contract between the group organiser and a VLOG recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG²⁷



Explanation:

- *A group member may only be a member of one VLOG group for a specific product area (e.g. milk production). If a group member produces animals/animal products for different product sectors (e.g. milk and meat), the business may be a group member of different VLOG groups for each product segment. If a business is a member of a VLOG group, independent certification according to the VLOG Standard is not permissible for this area of applicability.*
- *“Ohne Gentechnik” labelling of food products of a group member is only permissible once this group member has been reported to the certification body in accordance with the requirements in Chapter F 2.2.1, an initial collection of group member data has been done by the group organiser, an audit of the group member has been done by the certification body, if necessary, and the group member has been accepted by the certification body for the VLOG group.*

F 2.2 Certification Procedure

Group certification in agriculture is to be performed in accordance with the following steps: (see Chapter F 2.2.1 to F 2.2.8)

- Application for certification made to a VLOG recognised certification body and submission of the group description (see Chapter F 3.1) including risk grading of the agricultural operations.
- 25 %-process (see Chapter F 2.2.2): initial collection of group member data by the group organiser
- Audit planning by the certification body with the group organiser (scope, date/time, duration of audit)
- Auditing of the retail group organiser and the retail group members in accordance with Chapter A 3.7 by the auditor including evaluation of the requirements, verification of risk grading
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
 - including confirmation of the approved retail group members
- Certification of the VLOG agricultural group

The described process must also be applied to new group members.

²⁷ Known as “Certification Agreement” until 20 June 2017.

F 2.2.1 Application for Certification, Submission of Group Description

The group organiser applies to the certification body for group certification in accordance with the VLOG Standard, and submits the group description (see Chapter F 3.1).

The group organiser must determine the basis on which the VLOG initial certification and the future approval of additional group members will be carried out (see Annex 8):

- **25 %-process:** Initial collection of group member data by the group organiser, together with audits by the certification body at the group organiser and at 25 % of the group members (see Chapter F 2.2.2)

or

- **100 %-process:** Audit of the group organiser and all group members by the certification body (see Chapter F 2.2.3).

The chosen initial certification procedure is to be used for approval of new group members of a VLOG agricultural group. The certification body will subsequently update the list of members (see Chapter F 2.2.7).



Explanation: If 25 %-process is selected, each facility must be audited by the group organiser prior to addition.

Without an audit by the certification body, a member can only be accepted if the 25% requirement is still met after the member's acceptance within the respective calendar year. If this is not the case, a corresponding number of facilities/candidates must be audited by the certification body in order to meet this value.

Example: if ten farms join the group in March, the group organiser arranges an initial data collection for each facility and the certification body performs an initial audit on at least three. If two additional farms (11th and 12th farms) then join in June of the same year, the 25 % for this calendar year is already covered by the three farms audited in March (25 % of 12 = 3). The two new farms can be included in the group without a certification body audit. If four additional farms were to join the group in October, one of these farms would have to be audited by the certification body (25 % of 16 = 4).

F 2.2.2 Initial Certification Based on Initial Data Collection by the Group Organiser (25 %-process)

The certification body must perform an initial audit of the group organiser.

The group organiser performs the initial collection of data from all group members, i.e. on-site self-monitoring using the VLOG checklists (Annex 22) by demonstrably competent personnel of the group organiser, and verifies the information in the facility descriptions of the individual group members.

These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.

On the basis of these initial data collections, the group organiser is to perform a risk grading of all group members according to the requirements in Chapter E 2.1. The group organiser subsequently forwards all facility descriptions, also indicating the corresponding risk categories, and checklists for each group member to the certification body.

The certification body reviews and evaluates the group description and the facility descriptions of all group members and the group organiser. Information/documents that are missing or require correction are requested from the group organiser. Once all information/documents are complete, the

certification body is to verify the results of the initial data collection by the group organiser for at least 25 % of the group members by performing its own initial audits.

The certification body must compare the results of the initial data collections by the group organiser with its own results and will initiate whatever measures may be required. The certification body has the right not to accept the data collected by the group organiser and to conduct an audit of all group members. Such a decision must be properly substantiated in detail.

The certification body is to verify the grading of the group members into risk categories and will base the audit intervals of each group member for the coming audit period on this grading.

The initial certification of the VLOG group will be based on the initial data collections and the audits by the certification body of the group organiser and the group members; if necessary, with follow-up audits.



Explanation: See Annex 8 for a schematic representation of the group certification procedure.

The audit of the group organiser is generally done before the audits of the group members.

During the 25% audit, the certification body is responsible for ensuring a balanced distribution of the audits of the group members, taking into account the risk grading of the group organiser and e.g. size of the facility and organisation, geographic location, feed supplier, etc. If the certification body considers it necessary, it may also audit more than 25 % of the group members.

F 2.2.3 Initial Certification on the Basis of 100 % Audits by the Certification Body (100 %-process)

As an alternative to E 2.2.2, all audits are to be performed by the certification body (see Annex 8):

The certification body must perform an initial audit of the group organiser.

The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body then performs VLOG audits in accordance with Chapter A 3.7 at the group members. Risk grading and the certification decision are to be reviewed based on the VLOG audit.



Explanation: The audit of the group organiser is generally done before the audits of the group members.

F 2.2.4 Effects of Audit Results on Labelling and Marketing

- If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with “VLOG” or the “Ohne GenTechnik” seal is not permitted for any members of the VLOG group.
- The continued marketing of “VLOG”- or with “Ohne GenTechnik” seal labelled food by the group is permitted if individual group members are excluded from the group. In this case, only the excluded former group members are prohibited from marketing food labelled as “VLOG” or with the “Ohne GenTechnik” seal.

F 2.2.5 Certificate Issuance

The VLOG certificate will be issued for the VLOG agricultural group and must contain the business name of the group organiser.

Group members do not receive individual certificates.

The certification body also provides the group organiser with a member list, which contains the following data for each group member:

- The defined risk category

- The last routine audit date
- For egg-laying businesses also: the print numbers.

F 2.2.6 Issuance of Certificates for Group Members

If a group member delivers “VLOG” products or animals to another customer aside from the group organiser, the certification body may issue a certificate stating that the facility belongs to a VLOG group certification. The certificate states that it is only valid as long as the facility is a member of the VLOG group and the group has a valid certificate.



Explanation: The group organiser's permission is not necessary to issue the certificate. However, the competent certification body should inform the group organiser of the issuance of the certificate.

F 2.2.7 Modifying/Updating of the Members List

The group organiser must immediately report changes and/or updates affecting the member list (see Chapter F 3.1) to the certification body.

F 2.2.8 Distribution of the Audit Report

For each audit, the group organiser and/or the audited group member are to receive an audit report from the certification body including any deviations found and measures to be implemented.



Explanation: The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

F 2.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body with auditing the group members:

- the group organiser must describe the scope of certification of the various certification bodies (e.g. which certification body will audit which group members/member groups)
- the groups must be organised such that each certification body independently audits the respective group or its scope of applicability.
- the group description must be submitted to each certification body.
- the certification body must also audit the group organiser's compliance with the requirements in the determined scope of certification. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an on-site audit of the group organiser.
- only one certification body, in coordination with the other involved certification bodies, will issue a certificate for the entire group.
- a written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is required.
- the group organiser ensures that all activities necessary for certification are performed.

F 2.4 Follow-up Certification and Monitoring/Audit Intervals

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective actions by the group members.

In the case of agricultural group certifications, the certification body is to perform an audit of the group organiser every year; for the group members, audits at the intervals specified for the corresponding risk category. The audit interval commences as of the date the certificate is first issued.

The following audit intervals apply for the respective risk categories:

- All group members in Risk Category 0 must be audited by the certification body within 3 years (i.e. at the latest in the third following year of the last audit)
- All group members in Risk Category 1 must be audited by the certification body within 2 years (i.e. at the latest in the second following year of the last audit)
- All group members in Risk Category 2 must be audited annually by the certification body.

	<u>Year of Initial Certification</u>	<u>1st Following Year</u>	<u>2nd Following Year</u>	<u>3rd Following Year</u>	<u>4th Following Year</u>	<u>5th Following Year</u>	<u>6th Following Year</u>
<u>Example</u>	2019	2020	2021	2022	2023	2024	2025
<u>Risk Category 0</u>	Initial Audit*	-	-	Audit**	-	-	Audit**
<u>Risk Category 1</u>	Initial Audit*	-	Audit**	-	Audit**	-	Audit**
<u>Risk Category 2</u>	Initial Audit*	Audit**	Audit**	Audit**	Audit**	Audit**	Audit**

Figure 3: Audit intervals of agricultural operations applicable to group certifications

* 25 %-process: Auditing by group organiser and of at least 25 % of group members by the certification body. 100 %-process: Auditing 100 % of the group by the certification body.

**Audit by Certification Body

If a follow-up audit is conducted sooner than necessary (e.g., one calendar year sooner), subsequent regular audits must also be scheduled sooner.

F 2.5 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Contractually binding of the group members (F 3.2)
- Risk management (F 3.3)
- Handling of non-compliant feed, products and animals (F 3.6)
- Crisis management (F 3.9)

F 3 Requirements for Group Organisers

F 3.1 Group Description, Members List and Facility Description

Group Description (see Annex 23)

The group organiser must submit a current group description to the certification body when applying for VLOG certification. The group organiser must promptly notify the certification body of major changes in the group description pertaining to VLOG 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 the VLOG 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, self-monitoring of the agricultural operations, sampling, testing, etc.*)
- The persons in charge of group certification for the group organiser, including their contact data
- The basis used for the initial VLOG certification and the approval of additional group members in the future (100 %- or 25 %-process)

Members list (see Annex 23)

The current members list for the group certification must have been submitted. It must at least contain the following information for each group member:

- Address, official authorisation number, contact person and contact data
- The defined risk category
- The last routine audit date
- For egg-laying businesses also the print numbers.

The group organiser must immediately notify the certification body of changes to the members list.



Explanation: At the request of VLOG, the group organiser must promptly send the current list of members to VLOG.

Facility Description

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.



Explanation: Major changes pertaining to VLOG certification include, e.g. change of risk category, products and/or processes.

F 3.2 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.

F 3.3 Risk Management (KO)

Risk analysis

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

The risk analysis includes at least:

- Animals and feed for the “ohne Gentechnik”/“VLOG” area
- Handling of feed, animals and products that meet the requirements for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal and those that do not meet the requirements for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions have been introduced and implemented for the identified risks based on the risk analysis.

There must be an annual review of the risk management, including a review of the group description, e.g. as part of an internal audit.

F 3.4 Implementation of the Requirements for Sampling and Testing

Sampling and testing plan

The group organiser must submit a written sampling and testing plan for the group members that defines the risk-based sampling and GMO testing of the risk-prone feed in the business relevant for “Ohne Gentechnik” production. 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 testing plan, in compliance with the requirements listed in Part J, 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, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods 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.

Test frequency

At minimum, the testing results required per Chapter E 4.9 must be submitted for each agricultural group member within the respective audit interval.

Evaluation of the analytical data

The group organiser must:

- collect the test results of the group members, and evaluates these 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.

Handling of positive test results

In the event of positive GMO test results, the group organiser must derive (corrective) action in accordance with Annex 5 and Chapter F 3.6.



Explanation: If collective samples of feed are tested, the results may not be factored as test results pertaining to individual operations.

Sampling and GMO testing is not required if the utilised risk-prone feed cannot be tested for genetic engineering for technical reasons.

F 3.5 Training of Staff and Group Members by the Group Organiser

All staff members of the group organiser involved in the operating procedures 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. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the 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.



Explanation: Staff members of the group organiser involved in the operating processes of relevance to “VLOG” certification include, e.g. QM, Procurement etc.

F 3.6 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 are to be defined in the procedure.



Explanation: Non-compliant feed must be identifiable, e.g. based on positive test results.

F 3.7 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.

F 3.8 Goods Recall

An effective and documented procedure for goods recall, including definition of responsibilities, must be in place for non-compliant products according to the VLOG Standard.



Explanation: No goods recall procedure is needed for products and animals that cannot be taken back (e.g. raw milk, eggs).

F 3.9 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 includes at least:

- Steps to take in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency numbers

- Provision requiring immediate notification of the VLOG head office using the VLOG Incident Sheet (see Annex 34), of the certification body and of affected business partners and customers
- 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.

F 3.10 Corrective Action/Continuous 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 period. Both are to be documented.

F 3.11 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 or labelling with “Ohne GenTechnik” seal are to be retained for at least the following period, unless statutory provisions require a longer retention period: at least five years.



Explanation: Documents that must be retained are, e.g., delivery slips, supplier evaluations, training documents, etc.

F 3.12 Internal Audits

The group organiser is to perform annual internal audits which at a minimum must cover the general and business-specific Standard requirements for the Group Organiser 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 units.

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In the following part, the specific rules and requirements for the Food Stage and its sub-stages are described.

G 1 Stage Definition and Mandatory Certification

i *Explanation: VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG-certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found here: https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard/Weitere_Dokumente/Als_gleichwertig_anerkannte_Standards.pdf*

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<p>Food preparation: Preparation comprises sorting and labelling unprocessed products under Regulation (EC) No. 852/2004 as well as the activities referred to in Art. 2 (1) n) of Regulation (EC) No. 852/2004 and slaughter of animals.</p> <p>Food processing: Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding, filtrating or a combination of these various processes (Regulation (EC) No. 852/2004).</p>			
Food of animal origin/ingredients	<p>For processing/preparing/packaging products of animal origin up to the Packaging Stage in end consumer packaging whenever products of animal origin are to be labelled as “VLOG” or with the “Ohne GenTechnik” seal.</p> <p>For the retail trade, whenever preparation occurs in outlets, and bulk goods of animal origin are to be labelled with the “Ohne GenTechnik” seal (separate Standard Part H).</p>	No relevant areas	<p>G 1-G 3, G 5, J 1 if applicable</p> <p>H 1-H 3</p>
Plant-based food/ingredients	For plant-based products which are to be labelled as “VLOG” or with the “Ohne GenTechnik” seal.	For plant-based products which are not to be labelled as “VLOG” or with the “Ohne GenTechnik” seal.	G 1-G 5, J 1

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	For risk-prone plant-based products which are to be labelled as “VLOG” or with the “Ohne GenTechnik” seal and which are produced with plant-based ingredients for which there is a plausible risk of carryover/appearance of unapproved GMO variants (see Chapter G 5).		G 1- G 5, J 1
Food transport and trading of food is assigned to the Logistics stage. The checklist for the Logistics Stage (see Annex 14) must be applied.			

G 2 Details of the Certification Procedure

G 2.1 Risk Grading

Risk Category 0 (There is no or only very low risk)

- As a matter of principle, businesses that process or store swappable GMOs on their premises cannot be graded as Risk Category 0.

Risk Category 1 (There is moderate risk)

- Businesses and process steps with clear physical segregation in the processing of products for which “ohne Gentechnik” labelling would be permissible and such products that do not meet the requirements for “ohne Gentechnik” labelling.

Risk Category 2 (There is high risk)

- Businesses and process steps without physical but with temporal segregation in the processing of products for which “ohne Gentechnik” labelling would be permissible and such products that do not meet the requirements for “ohne Gentechnik” labelling
- Test results from the audit period under consideration have indicated that the threshold value of 0.1 % GMO per ingredient was exceeded; this resulted from the business' failing to take measures to avoid carryover.

G 2.2 Audit Frequency

Routine audits are to be carried out annually.

G 2.3 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Risk management (G 3.3)
- Incoming goods inspection (G 3.5)
- Segregation of goods flows/exclusion of commingling and swapping (G 3.6)
- Handling of non-compliant raw materials/products (G 3.7)
- Inspection of outgoing goods/labelling on bills of lading (G 3.8)
- Traceability (G 3.9)
- Crisis management (G 3.12)

G 3 General Requirements

G 3.1 Facility Description

The facility description (Annex 25) is on file and up-to-date.

The certification body is to be promptly informed about major changes pertaining to the VLOG certification.

i *Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents and tests listed therein must be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG. Major changes pertaining to the certification include, e.g., changes in risk category, products and/or processes.*

i *Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business can still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.*

G 3.2 Assignment of Responsibilities/Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

i *Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.*

G 3.3 Risk Management (KO)

Risk analysis

A documented risk analysis must be established for all relevant raw materials, products, procedures and processes, including risk assessment for “ohne Gentechnik”/“VLOG” labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and products (including additives, enzymes, microorganism cultures, processing aids and substances within the meaning of Sec. 3 (5) EGGenTDurchfG for the “ohne Gentechnik”/“VLOG” area (incl. countries of origin)
- Handling of raw materials/products for which “ohne Gentechnik”/“VLOG” labelling would be permissible, and raw materials/products that do not meet the requirements for “ohne Gentechnik”/“VLOG” labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions must be introduced and implemented for the identified risks based on the risk analysis.

G 3.4 Commissioning External Service Providers

If activities are outsourced to external service providers, the latter must be integrated into the business' risk management system (see Chapter G 3.3).

For activities requiring certification (Chapter B 1 and G 1) in the areas of food processing/food preparation, transport, storage, handling and/or trade that VLOG-certified businesses commission to external, non-VLOG certified service providers, an audit or certification of the service provider is to be performed in accordance with Chapter A 3.2.1.

G 3.5 Incoming Goods Inspection (KO)

With regard to incoming goods, it must be ensured that all "Ohne Gentechnik"/"VLOG" raw materials and products meet the requirements (see Chapter A 1.3.2 and A 1.4).

A complaint is to be issued to the supplier for incomplete bills of lading. If, for systemic reasons, no delivery slips/shipping documents are prepared (e.g. milk collection), there must be a clear contractual provision regarding delivery.

Incoming goods inspection of animal raw materials/products:

A certification according to the VLOG Standard must exist for all raw materials and products of animal origin used²⁸.

- The bills of lading are to be checked for the "VLOG" label within the scope of incoming goods processing.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification.

Incoming goods inspection of - non-VLOG-certified raw materials/products of non-animal origin:

For all raw materials of non-animal origin, the supplier must submit:

- a GMO-Free Certificate according to the VLOG "Ohne Gentechnik" Production and Certification Standard (Annex 1).

The business is to verify once per year, in an expedient manner, whether the certification in the issued form is still valid and whether the specification for the article remains unchanged.

Incoming goods inspection of VLOG-certified raw materials and products of non-animal origin:

- The bills of lading are to be checked for the "VLOG" label within the scope of incoming goods processing.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

²⁸ Honey or other apiculture products that are not certified under the VLOG Standard or Council Regulation (EC) 834/2007 may be processed into "VLOG" food if evidence can be provided that no GMOs are cultivated or released within a circumference of 10 km from the apiaries or, alternatively, that there is an analytical result for a batch that was assessed pursuant to VLOG specifications and that shows no genetic modification.



Explanation: For non-VLOG-certified raw materials/products of non-animal origin, in addition to the supplier certification, a note and/or clear contractual provision may be included in the bill of lading.

For the labelling of non-VLOG-certified raw materials/products that meet the requirements of EGGenTDurchfG and the VLOG Standard, VLOG recommends the following wording on the bills of lading: "Ingredient suitable for the production of "ohne Gentechnik"-labelled food."

G 3.6 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

The physical and/or temporal segregation of goods flows must ensure that raw materials/products not suitable for "ohne Gentechnik"/"VLOG" labelling at no time come into contact with the goods flows of the products destined for "ohne Gentechnik"/"VLOG" labelling or for 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.



Explanation: If animals are fed in slaughterhouses (e.g. due to longer wait times) it must be ensured that the utilised feed is not subject to compulsory labelling according to Regulation (EC) No. 1829/2003 or 1830/2003.

G 3.7 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 affected raw materials and products
- Notification of customers/buyers and suppliers
- 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 are to be defined in the procedure.



Explanation: Non-compliant raw materials or products must be identifiable, e.g. based on positive test results.

G 3.8 Inspection of Outgoing Goods/Labelling on Bills of Lading (KO)

VLOG-certified raw materials and products must be clearly labelled on all bills of lading or in the case of packed goods, on the packaging, using the wording "VLOG" and/or the "Ohne GenTechnik" seal (see Chapter A 1.2.1). It must be clearly evident to which raw materials/products the labelling refers.

If no waybills/bills of lading are produced due to the nature of the system (e.g. milk collection), an unequivocal contractual regulation is to be made concerning delivery which ensures the above-mentioned labelling.



Explanation: For the labelling of non-VLOG-certified raw materials/products that meet the requirements of EGGenTDurchfG and the VLOG Standard, VLOG recommends the following wording on the bills of lading: "Ingredient suitable for the production of "ohne Gentechnik"-labelled food." For advertisement and placement on the German market, only the use of the words "ohne Gentechnik" is permitted.

G 3.9 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 must be generated within one working day to allow for conclusions about goods flows and their plausibility.



Explanation: For this purpose, the following data is to be determined, among others:

- *Information on supplier and delivery date*
- *Quantity*
- *Creation of batches, if applicable (including re-working)*
- *Information on delivery date and supplied customers*

G 3.10 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 initiated for justified complaints and feedback.

G 3.11 Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, must be in place for non-compliant raw materials and products according to the VLOG Standard.

G 3.12 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/products. This procedure must be implemented and includes at least:

- Steps to follow in the event of an incident
- Assigned responsibilities including substitute rules

- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provisions requiring immediate notification of the VLOG head office using the VLOG Incident Sheet (see Annex 35), of the certification body and of affected business partners and customers
- 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.

G 3.13 Corrective Action/Ongoing Improvement Process

If non-compliant raw materials or 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 period. Both are to be documented.

G 3.14 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to “ohne Gentechnik”/“VLOG” labelling or labelling with the “Ohne GenTechnik” seal must be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the batch/lot + one year, but not less than two years.



Explanation: Documents that must be retained include bills of lading, clearance certification, records of production and goods flows (including reworking), training documents, etc.

G 3.15 Staff Training

All staff members involved in operating procedures of relevance to “VLOG” labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity as well as at least once a year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.



Explanation: The intensity of training varies depending on the staff member and is to be oriented towards the responsibility of the staff member for the proper flow of the “VLOG” operating procedure.

G 3.16 Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business specific Standard requirements of the Food Processing/Food Preparation 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 units.

G 4 Specific Requirements for ~~Plant-Based~~ Raw Materials of Non-Animal Origin

G 4.1 Sampling and Testing

Risk-based sampling and GMO testing of raw materials and products relevant for “Ohne Gentechnik” production is to be performed according to the following statements.

G 4.1.1 Sampling and Testing Plan

A written sampling and testing plan must be available that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and testing plan is to be implemented according to schedule.

Sampling and GMO testing can be reduced if the utilised raw materials and products are not risk-prone and/or cannot be tested for genetic engineering for technical reasons.

In this case, a risk analysis must be in place as the basis for developing a sampling and testing plan that includes at least the following criteria for all raw materials/products utilised in “Ohne Gentechnik” production:

- Country of origin for raw material/product
- GMO cultivation authorisation (globally and in country of origin)
- Cross-contamination
- Suitability for testing of the raw material/product
- Commingling and/or carryover during transport, storage and processing
- Certification status of the raw material/product (e.g. VLOG or a standard recognised as equivalent)



Explanation: The VLOG homepage offers an assessment aid to determine the suitability of raw materials for testing:

[http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further Documents/Suitability of GMO Analysis for Feed Raw Materials and Foods.pdf](http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf).

G 4.1.2 Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in Table 9 annually, at minimum.

Based on the risk analysis produced in accordance with Chapter G 4.1.1, the business determines the scope for reducing sampling and testing frequency.

The certification body reviews and approves the reduction of sampling and testing frequency on the basis of the risk analysis. The respective decision must be documented. In addition, the certification body must notify VLOG of approved reductions and will submit the risk analysis upon which the reduction is based on request by VLOG.

All samples to be tested must be processed in a VLOG recognised laboratory.

Risk category	Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods ²⁹
0	2 x per year samples/tests
1	6 x per year samples/tests
2	12 x per year samples/tests

Table 9: Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods



Explanation: The number of samples may be correspondingly reduced if the number of lots received in the audit period is smaller than the minimum number of samples listed in Table 9.

Furthermore, batch-related test results from a VLOG-recognised laboratory can be counted towards meeting the minimum number of samples.



Explanation: Raw materials/products that are certified according to VLOG or another standard recognised as equivalent do not need to be sampled and tested.

G 4.1.3 Handling of Positive Test Results

Positive test results are to be treated according to Annex 6.

The affected raw materials and products present in the business are to be handled as outlined in Chapter G 3.7.

G 5 Specific Requirements for Risk-Prone Raw Materials/Ingredients

Specific requirements for risk-prone raw materials (e.g. rice, salmon) are to be determined outside the VLOG Standard in the document Risk-Prone Raw Materials/Ingredients. The overview is to be updated regularly based on risk: [http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further Documents/Specific Requirements for Risk-Prone Raw Materials - Ingredients.pdf](http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Specific_Requirements_for_Risk-Prone_Raw_Materials_-_Ingredients.pdf).

²⁹ The number of samples relates to the total quantity of raw materials used in VLOG-production.

G 6 Specific Requirements for Transport, Storage, Handling and/or Trading

If the business performs activities in the area of transport, storage, handling, trading and/or drop shipping of food that are subject to the certification obligation, the relevant requirements according to Part B must be followed. The checklist for the Logistics Stage (see Annex 14) must be applied.

Part H: Retail Stage – Sale of Bulk Food of Animal Origin

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In the following section, the requirements for the sale of bulk food of animal origin in retail is described, the certification of which is done within the scope of retail group certification. At the request of businesses or certification bodies to VLOG, the requirements for individual certification of businesses at this stage will be published.

H 1 Stage Definition and Mandatory Certification

i *Explanation: VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG-certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found here: https://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard/Weitere_Dokumente/Als_gleichwertig_anerkannte_Standards.pdf*

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Retail: Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.			
VLOG retail group: A VLOG retail group is a combination of branch operations (the so-called retail group members) for the purpose of VLOG group certification in retail.			
Retail group organiser, hereinafter group organiser: Business in a VLOG retail group having responsibility for a risk management that includes the retail group members. In VLOG retail group certification, certification is to be issued through the retail group organiser, i.e. the group organiser receives the certification for the VLOG retail group.			
Retail group member, hereinafter group member: Branch/site contractually integrated into a VLOG group.			
	For bulk goods of animal origin at a central distribution facility and counter sales, labelled with the “Ohne GenTechnik” seal	No relevant areas.	H 1-H 3

H 2 Details of the Certification Procedure

H 2.1 Conditions and Requirements for Retail Group Certification

- Contract between the group organiser and a VLOG recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG³⁰



Explanation: The VLOG group sells a very high portion of its bulk “VLOG” food (at least 90 % of the products) to end consumers. If this is not the case, the VLOG requirements for food processing/preparation (see Part G) must also be taken into account within the business and in the VLOG certification.

H 2.2 Certification Process

Group certification is to be performed in accordance with the following steps.

- Application for certification made to a VLOG recognised certification body and submission of the group description (see Chapter H 3.1)
- Audit planning by the certification body with the group organiser according to Chapter A 3.6 (scope, date/time, duration of audit)
- Auditing of the retail group organiser and the retail group members in accordance with Chapter A 3.7 by the auditor, including evaluation of the requirements in accordance with Chapter A 3.9
- Audit evaluation/review by the certification body in accordance with Chapter A 3.9.2
 - including confirmation/correction of the audit result
 - including confirmation of the approved retail group members
- certification of the VLOG retail group in accordance with Chapters H 1 to H 2.2.4.

H 2.2.1 Audit Intervals and Scope of the Audit

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective actions by the group members.

Initial certification

The certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

- 10 % of the group members per year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until sale to the customer must be ensured (see Chapter H 3.11). These audits are announced.
- 10 % of the group members per year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until the service counter must be ensured (see Chapter H 3.11). These audits are unannounced.

³⁰ Known as “Certification Agreement” until 20 June 2017.

- 100 % of the group members if the “Ohne Gentechnik”/“VLOG” food may be purchased locally by the branches. These audits are unannounced.

Based on the information provided by the group organiser in the group description (see Chapter H 3.1) the certification body conducts audits of branches, which may either be announced to the central purchasing department or unannounced. If the audits are announced and the certification body concludes, based on its on-site audit, that traceability can only be ensured up until the service counter, 10 % of the audits of branches in subsequent years will be unannounced.

Follow-up Certification

The certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

- 10 % of the group members per year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until sale to the customer must be ensured (see Chapter H 3.11). These audits are announced.
- 10 % of the group members per year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until the service counter must be ensured (see Chapter H 3.11). These audits are unannounced.
- 100 % of the group members if the “Ohne Gentechnik”/“VLOG” food may be purchased locally by the branches. These audits are announced.



Explanation: If all the audit criteria, incl. original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.

H 2.2.2 Effect of Audit Results on Labelling and Marketing

- If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with the “Ohne GenTechnik” seal is not permitted for the entire VLOG group.
- Marketing of “VLOG” food may continue to be done by the retail group if individual retail group members are excluded from the group. In this case, “VLOG” marketing or marketing with the “Ohne GenTechnik” seal is no longer permitted only for the excluded group members.

H 2.2.3 Certificate Issuance

The certificate is to be issued to headquarters for the “bulk goods” area of application in accordance with Chapter A 3.11. The VLOG certificate must also indicate the category of products (e.g., poultry meat, cheese). The participating branches must be listed in an annex to the certificate.

The group organiser is to report changes to the list of members promptly to the certification body. It is the responsibility of the certification body to decide whether additional audits must be carried out.

For the Retail group certification, the member list must contain, for each branch:

- The last routine audit date.

H 2.2.4 Distribution of the Audit Report

For each audit, the group organiser and/or the audited group member are to receive an audit report including any deviations found and measures to be implemented.



Explanation: The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

H 2.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body with auditing the group members:

- The group organiser must describe the scope of certification of the various certification bodies (e.g. which certification body will audit which group members/member groups)
- The groups must be organised such that each certification body independently audits a respective group or its scope of applicability.
- The group description must be submitted to each certification body.
- The certification body must also audit the group organiser's compliance with the requirements in the determined scope of applicability. Depending on the area of responsibility, the audits may be conducted at the headquarters or at the retail group member. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an on-site audit of the group organiser.
- Only one certification body, in coordination with the other involved certification bodies, will issue a certificate for the entire group.
- A written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is required.
- The group organiser ensures that all activities necessary for certification are performed.

H 2.4 Knock Out (KO) Requirements

- Contractually binding of the group members (H 3.2)
- Risk management (H 3.3)
- Incoming goods inspection (H 3.5)
- Segregation of goods flows/exclusion of commingling and swapping (H 3.6)
- Handling of non-compliant raw materials/products (H 3.9)
- Traceability (H 3.11)
- Crisis management (H 3.12)

H 3 Requirements for Group Organisers and Group Members

H 3.1 Group Description

The group organiser must submit a current group description to the certification body when applying for VLOG certification.

The group description 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”.
- 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 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 ³¹
- A list and description of the activities of the subcontractors/contract processors/outsourced processes, which are integrated into the VLOG 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-work
- List of all authorised suppliers of “ohne Gentechnik”/“VLOG” food/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 the audit, the updated group description, annexes, and documents listed therein must be submitted to the auditor for review. 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.



Explanation: The designation of responsibilities within the organisational chart, within the branches may be linked to functions/job descriptions.

If the VLOG retail group establishes a central sales concept for all branches, which is implemented in an identical manner by all the branches, it is sufficient if a single description of the group is prepared, regularly updated and available at the respective group member. Deviating characteristics of individual branches are to be documented correspondingly in the group description.

The documents to be submitted to the auditor can be made available electronically. At the request of the business, all documentation other than the product and member list may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents.

³¹ If, for example, counter staff make incorrect PLU entries at checkout at a particular branch, traceability can only be ensured up until the service counter.

H 3.2 Contractual Binding of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract/participation statement. This covers at least the following points:

- Compliance with the VLOG Standard
- The requirements and obligations of the individual group's risk management

The contract (participation statement) must be signed by the group member.

H 3.3 Risk Management (KO)

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” 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, agreements, reliability etc.)
- Sales/Declaration
- Other business-specific items as necessary

Risk management

Preventive, monitoring and control actions have been introduced and implemented for the identified risks based on the risk analysis.

There must be an annual review of the risk management, including a review of the group description, e.g. as part of an internal audit.



Explanation: If further ingredients (e.g. marinades) not procured from VLOG-certified suppliers or suppliers certified in accordance with another equivalent standard are added to the bulk “ohne Gentechnik”/“VLOG” goods in the branch, the risk analysis must be expanded to assess the possibility of the use of flavourings, enzymes, microorganisms, additives, auxiliary substances, and other food ingredients, based on certificates provided by the suppliers. A template of a correct certificate confirming the GMO-free status of a product is included in the VLOG Standard, see Annex 1. The use of raw materials of animal origin is only permissible if they are certified under the VLOG Standard or a standard recognised to be equivalent.

H 3.4 Procurement (Suppliers and Producer Certification)

A system must be in place for approval of suppliers and articles. The ordering of bulk and packaged “ohne Gentechnik”/“VLOG” goods is to be transparent.

For bulk “ohne Gentechnik”/“VLOG” goods, the following documents are to be available:

- List of suppliers
- List of articles
- Specifications

The abrogation of documentation and retention periods for formulations/formulation changes must be approved by a manager at the facility.

H 3.5 Incoming Goods Inspection (KO)

With regard to incoming goods, it must be ensured that all “ohne Gentechnik”/“VLOG” raw materials and products meet the requirements (see Chapter A 1.3.2 and A 1.4).

- A documented check of the “VLOG” label is to be performed on packaging and delivery slips and/or invoices.
- The Supplier's certification is to be checked.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.
- For non-VLOG-certified raw materials not of animal origin, a certificate shows that they are GMO free in accordance with Annex 1.

H 3.6 Segregation of Goods Flows/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.



Explanation: The goods must be segregated physically (e.g. using shelves, crates, or trays) during storage, handling, and presentation/sale, as well as through clear and seamless labelling of the “ohne Gentechnik”/“VLOG” raw materials/semi-finished products/finished products.

Joint storage of bulk “Ohne Gentechnik”/“VLOG” goods with bulk goods not suitable for “ohne Gentechnik” labelling is not permitted. Clear segregation, e.g. using different containers, is mandatory.

All reusable devices and containers used for the processing, presentation and storage of “Ohne Gentechnik”/“VLOG” products must be prepared prior to being used for “Ohne Gentechnik”/“VLOG” products such that the possibility of commingling is excluded.

Segregation measures, interim cleaning stages and production sequences are to be defined and implemented in a risk-oriented manner in the risk management.

H 3.7 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.

H 3.8 Training of Staff and Group Members by the Group Organiser

All staff members of the group organiser involved in the operating procedures 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. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the 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.



Explanation: Staff members of the group organiser involved in the operating processes of relevance to “VLOG” certification include, e.g. QM, Procurement etc.

H 3.9 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 affected 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

Responsibilities are to be defined in the procedure.

H 3.10 Labelling

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

H 3.11 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.



Explanation: The following data is to be collected to this end:

- *Information on supplier and delivery date*
- *Quantity*
- *Creation of batches, if applicable (including re-working)*
- *Information on delivery date and supplied customers³²*

The sale, refinement, write-offs, and inventory adjustments of bulk “Ohne Gentechnik”/“VLOG” goods 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.

H 3.12 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/products. This procedure is to be implemented, must take into account all branches, and has to comprise, at a minimum:

- Steps to be taken in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provisions requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (see Annex 3534), of the certification body
- 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.

H 3.13 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 period. Both are to be documented.

H 3.14 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 period, unless statutory provisions require a longer retention period: at least two years.

³² If, for systemic reasons, traceability can only be ensured up until the service counter and not up until sale to the customer (e.g., due to incorrect PLU entries by counter personnel), 10% of the branches will be audited unannounced each year.



Explanation: Documents that must be retained include bills of lading, supplier declarations, records of product and goods flows (incl. rework), training documents, etc.

H 3.15 Internal Audits

The group organiser must perform annual internal audits in the business of the group organiser and all branches. At a minimum, these audits 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 units.

In the scope of the internal audit, annually or per branch, at least two risk-based random sample checks are to be performed for goods tracing, incl. quantity comparison, and the results are 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
- Currentness and implementation of process and work instructions

Part I: Requirements for Certification Bodies, Auditors, Evaluators and Certifiers

The requirements for certification bodies, auditors, evaluators and certifiers have been removed from the “Ohne Gentechnik” Production and Certification Standard and now appear in the “Guideline for Certification Bodies, Auditors, Evaluators and Certifiers” instead.

The Guideline is available for download on the [VLOG home page](#).

Part J: Requirements for Laboratories and Tests

The requirements for VLOG laboratories (previously Chapters J2-J3) have been removed from the “Ohne Gentechnik” Production and Certification Standard and now appear in the “Guideline for Laboratories” instead.

The Guideline is available for download on the [VLOG home page](#).

J 1 Requirements for Commissioning a Test129

J 1 Requirements for Commissioning a Test

The client commissioning the GMO test undertakes:

- To check the VLOG recognition of the commissioned laboratory regularly, at least once per year.

When commissioning a laboratory, the following information must be indicated in the order or other documents having similar effect, and submitted to the laboratory:

- GMO testing order according to VLOG requirements
- Composition of the sample:

If containing soy, maize/corn, rapeseed/canola and/or rice feed material or ingredients, it must be indicated in what form these are contained (e.g. maize/corn as maize/corn mash, soy as soy extraction meal). Copies of the bills of lading/declarations are to be sent to the laboratory along with the samples.



Explanation: Annex 3 of the Guideline for Laboratories provides guidance regarding the order form, which contains all the minimum information that the laboratory must have to test VLOG samples.

Glossary: Definition of Terms

The following definitions and abbreviations are provided for simplification:

Animal category: Animals which fundamentally differ in their husbandry conditions are regarded as different animal categories (e.g. breeding pigs/fattening pigs, laying hens/chickens for fattening, heavy livestock/dairy cattle).

Animal production: The production or rearing of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.

Animal transport: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. A business exclusively providing animal transport only possesses the animals.

Auditor: Personnel made available by the certification body for the auditing of businesses. The auditor's responsibilities are described in ISO/IEC 17065.

Batch: An identifiable quantity of feed verifiably having common properties, such as origin, type, type of packaging, packer, shipper, or labelling.

Business: The administrative seat of a member operation. A general organisation which may consist of multiple sites/operating units.

Carrier: A business that transports goods from one location to another. The goods do not have to be the property of the carrier/shipping company.

Certifier: Personnel made available by the certification body for certifying businesses. The certifier's responsibilities are described in ISO/IEC 17065.

Component: All ingredients, additives, auxiliary processing substances, or other substances within the meaning of Section 3a, EGGenTDurchfG used in the production of feed or food products.

Compound feed: Compound feed are mixtures of feed materials (input products for feed), with or without additives, which are intended as complete or supplementary feeds for animal nutrition.

Conventional quality, products and raw materials: Not usable in the “ohne Gentechnik” process.

Conversion of feed materials to “VLOG geprüft” quality: Through incorporation

- into the VLOG certification,
- into a business' internal risk management and
- in particular, into a GMO monitoring system in accordance with Chapter C 3.3

purchased feed materials can attain “VLOG geprüft” quality at a feed dealer. Feed materials can also be processed (e.g. shredded, milled, pelleted).

Correction: A correction is a measure to eliminate a known fault.

Corrective action: Action/actions, leading to the elimination of the root causes of a fault, a shortcoming or any other undesired situation in order to avoid their reoccurrence or to reduce the frequency of reoccurrence.

Defective product: Food or feed that does not comply with “Ohne Gentechnik” or “VLOG geprüft” requirements.

Drop shipping: Drop shipping refers to the trading method wherein the goods are transported directly from the supplier to the customer of the drop shipper. The drop shipper does not take physical

possession of the goods; however, it is the party with whom the customer has a contractual relationship and who issues the invoice for the goods.

Dual production: Shared use of facilities and/or transportation means for the production, processing, transport, storage, handling and/or trade of “ohne Gentechnik” food or “VLOG geprüft” feed and food that does not comply with “ohne Gentechnik” or “VLOG geprüft” requirements.

EGGenTDurchfG: German act on the implementation of European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes (German EC Genetic Engineering Implementation Act).

Evaluator: Personnel made available by the certification body for the auditing of businesses. All information and results related to the on-site audit (evaluation) must be evaluated. The evaluator may not be involved in the on-site audit. The evaluator issues the certifier a recommendation regarding whether certification should be granted. If the evaluator and certifier are different people, the result of the evaluator must be documented separately.

External service provider: A business (contractor) that provides services and processes to another business (client) for a fee. The duration and substance of these services must be established in writing (e.g., by contractual agreement).

Examples of external services at the various stages:

- Logistics: Transport/storage of feed/food
- Feed production: Job order production of feed (private labelling)
- Agriculture: Outsourcing of part of production to a facility/stall that does not belong to the business
- Food processing: Slicing of cheese (slicer), sterilisation of spices, bottling of food

Facility: Legally independent businesses with one or several sites.

Feed: Substances or products, including additives, be it in processed, partially processed or unprocessed form, which are intended for oral feeding of animals.

Feed business: All businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in the production, manufacturing, processing, storage, handling, transportation or distribution of feed, including manufacturers who produce, process or store feed to be fed to animals in their own business (Regulation (EC) No. 178/2002).

Feed manufacturing/processing: All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc.

Feed material: Feed materials are feeds intended, as such or in processed form, to be fed to animals or used in the production of compound feed. Feed materials are of plant, animal or aquatic origin, or composed of other organic or inorganic matter.

Feed not subject to compulsory labelling: Feed which, according to Regulations (EC) No. 1829/2003 or No. 1830/2003, is not subject to compulsory labelling as “genetically modified”.

Feed subject to compulsory labelling: Feed which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, has to be labelled as “genetically modified”.

Food: Any and all substances or products that are intended for, or which can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

Food business: Any and all businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in an activity connected to the production, processing, and distribution of food.

Food preparation: Preparation comprises sorting and labelling unprocessed products under Regulation (EC) No. 852/2004 as well as the activities referred to in Art. 2 (1) n) of Regulation (EC) No. 852/2004 and slaughter of animals.

Food processing: Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding or a combination of these various processes (Regulation (EC) No. 852/2004).

GMO: Genetically modified organisms. According to EU Directive 2001/18/EC these are organisms in which the genetic material has been modified by means of molecular biological methods in a way that naturally is not possible by interbreeding and/or recombination.

Group member: (Agricultural) business or branch/site contractually integrated into a VLOG group.

Group organiser: Business in a VLOG group that organises the certification of the group and holds responsibility for a risk management system that includes the agricultural group members or retail group members.

Handling: Handling comprises all activities directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).

Internal audit: General audit process for all of the business's own activities. Carried out by or on behalf of the business for internal purposes. Internal auditing is an independent, objective monitoring and consulting activity that is intended to provide added value and improve the operations of a business.

KO criterion: A requirement which has a critical effect on “ohne Gentechnik”/ “VLOG geprüft” labelling in case of non-compliance.

Last living organism: The last organism that is able to pass on its genetic information.

Livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. As opposed to the animal carrier, a livestock trader owns the animals and may also take possession of the animals if applicable.

Logistics business: Any and all businesses which carry out logistical activities associated with food and feed, e.g., transport, storage, handling, distribution, loading and unloading.

Lot: See batch.

Matrix member: Business which is contractually integrated into a VLOG matrix.

Matrix organiser: Business in a VLOG matrix that organises the certification of the matrix and holds responsibility for a risk management system that includes all matrix sites.

Matrix site: A site that is contractually integrated into a VLOG matrix via a matrix member.

Mineral feed: Supplementary feed containing at least 40 % crude ash.

Mobile Grinding and Mixing Facilities: Facilities used commercially and for multiple operations; classified as a feed business (see Part C).

Non-compliant feed, animals, raw materials, products: do not meet the specifications of the VLOG Standard.

Non-VLOG animals: Animals not certified in accordance with the VLOG Standard.

“Ohne Gentechnik”-compliant feeding: Feeding that meets the specifications of the EC Genetic Engineering Implementation Act (i.e. feeding solely with feed that is not subject to compulsory labelling).

“Ohne Gentechnik” quality, products and raw materials: Usable in the “ohne Gentechnik” process (meets the requirements of EGGenTDurchfG and the VLOG Standard).

Operating unit: Parts of an agricultural operation which are completely separate from each other, except for their organisation. This may apply for, e.g., different barns or storage sites for feed.

For agricultural operations in Germany, parts of such a business that are assigned a VVVO number are generally defined as an operating unit.

Other substances within the meaning of Sec. 3a (5), (EGGenTDurchfG): within the meaning of Sec 5 (2), Food Labelling Regulation (LMKV) in the version dated 18 December 2007.

Outsourcing: Outsourcing takes place if the outsourcing laboratory is not accredited for the parameter and outsources GMO testing to another laboratory.

Plant-based production: The cultivation of primary products, including harvesting and foraging.

Positive test result: Any test result that confirms the presence of GMOs in feed, raw materials or products (regardless of the amount of GMO content). A positive test result does not automatically result in exclusion of the goods from “VLOG geprüft” or “ohne Gentechnik” production/marketing. The applicable limit values and conditions of EU Regulations 1829/2003 and 1830/2003 and EGGenTDurchfG must be followed for this classification (see Chapters A 1.3.1 and A 1.3.2).

Private Labelling (feed): Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the private labeller's specifications or the goods are purchased from the manufacturer and sold in the Private Labeller's name.

Processing: A substantial modification of the initial product, e.g., through heating, smoking, curing, ripening, desiccating, marinating, extracting, extruding, or through a combination of these different procedures (Regulation (EC) No. 852/2004).

Processed product: Food which has been produced from unprocessed products; these products may contain ingredients that are necessary for their production or for imparting special qualities.

Products (food): All substances or products that are intended for, or which in reasonable discretion can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

Raw materials: Any and all materials used to produce a food product.

Raw materials/products not subject to compulsory labelling: Food which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, is not subject to compulsory labelling as “genetically modified”.

Raw materials/products subject to compulsory labelling: Food which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, is subject to compulsory labelling as “genetically modified”.

Retail: Handling and/or processing of food and its storage at the point of sale or delivery to consumers, including shops, supermarket distribution centres and wholesale outlets.

Risk (within the meaning of the Standard): The probability of the occurrence of damage or nonconformity (legal or with regards to the standard) to “Ohne Gentechnik” food or “VLOG geprüft” feed.

Risk-prone feed: Feed that has a higher risk of GMO carryover due to the cultivation situation of the plant species, origin processing and/or supply chain. In accordance with the VLOG Standard, their compliance must be ensured by monitoring through GMO testing or a VLOG certificate.

- In the Feed Stage, feed is graded into risk-prone feed on the basis of a risk assessment of the feed business (see Chapter C 3.3).
- For the Agriculture Stage, Chapter E 4.9.1 defines risk-prone feed.

Shipping company: See Carrier.

Site: A site is defined as all premises and buildings of a business at a given postal address. Examples of an address are “Bahnhofstrasse 3a” or “Wiesengrund 1-5”.

Small agricultural operation:

- The main production focus is on milk, with a dairy herd of less than 40 lactating animals.
- The main production focus is on eggs, with less than 10,000 animals.
- The main production focus is on broiler chicken, with less than 16,000 fattening places.
- The main production focus is on fattening pigs, with space for less than 600 animals.
- Or a facility, independent of the main product and number of animals, with not more than 1 fulltime employee (at least 38 hrs/week) other than the facility manager and any members of the manager's family.
- Upon request, the VLOG will provide a definition of the main production focus of small agricultural operations that are not mentioned here.

Stationary Grinding and Mixing Facilities: Facilities existing in the operation and used exclusively within the operation.

Storage: The service of temporary storage of food and/or feed on behalf of a third party or storage in one's own external warehouses.

Subcontracting: Subcontracting means that the laboratory itself is accredited for this parameter, but due to special circumstances such as a lack of laboratory employees or resources, it assigns this parameter to another laboratory accredited for said parameter.

Supplementary feed: Compound feed having a high content of certain substances, but the composition of which makes it suitable for the daily ration only in combination with other feeds.

Supplier: The business from which the goods are bought. This can be, for example, the manufacturer or dealer.

Swappable or non-swappable GM feed/raw materials: GM feeds are swappable if their use, by their nature, would also be feasible in “ohne Gentechnik” production; e.g. GM soy meal in pig fattening and “ohne Gentechnik” milk production. Feed is non-swappable if clearly assigned to a production line and their use in “ohne Gentechnik” production is highly unlikely; e.g. GM milk replacers for calf rearing and “ohne Gentechnik” milk production.

Trading: Trading comprises all activities within the scope of which goods are sold – i.e. not produced at one's own facilities – and resold. In contrast to drop shipping, the trader takes possession of the goods and owns the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).

Transport: Transport means conveying goods from one place to another.

Unannounced audit: An audit of a retail branch conducted by the certification body without prior notice.

“VLOG geprüft” quality: Quality of a feed that is certified in accordance with the VLOG Standard.

VLOG group: A VLOG group is an association of agricultural businesses or retail sites/branches (the group members) for the purpose of VLOG group certification.

“VLOG” raw materials, products: Raw materials and products that are certified in accordance with the VLOG Standard and can be used in the “Ohne Gentechnik” process.

VLOG Standard: “Ohne Gentechnik” Production and Certification Standard as amended from time to time.

VLOG animals/VLOG animal categories: Animals or animal groups suitable for “Ohne Gentechnik” labelling of the food produced from them, and which are from agricultural operations which

- Are either themselves certified according to the VLOG Standard for animals or meat, or
- Are covered by a group certification according to the VLOG Standard for animals or meat.

VLOG certificate: Confirmation of successful compliance with the VLOG Standard issued by a certification body recognised by VLOG.

Annexes

Part 1 Suppliers' Declarations

1. GMO-Free Certificate According
2. Certificate for “ohne Gentechnik” Compliant Feeding of Animals
3. Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)

Part 2 Analytics

4. Sampling Log
5. Handling of Positive Test Results (feed)
6. Handling of Positive Test Results (food)
7. Reduction of the Scope of Testing after Changing Feed in Group Organisations

Part 3 Certification

8. VLOG Group Certification Process at the Agriculture Stage
9. VLOG Matrix Certification Process Logistics and Feed Manufacturing
10. Sanctions Catalogue
11. VLOG Certificate Template
12. Areas of Application of VLOG Certification

Part 4 Audit Documents

13. Facility Description Logistics
14. Checklist Logistics
15. Facility Description Feed Manufacturing
16. Checklist Feed Manufacturing
17. Facility Description Mobile Grinding and Mixing Facilities
18. Matrix Description and List of Sites
19. Checklist Matrix Organisation
20. Facility Description Agriculture
21. Facility Description Animal Transport/Livestock Trade
22. Checklist Agriculture including Animal Transport and Livestock Trade
23. Group Description Agriculture including Members List
24. Checklist Group Organisation
25. Facility Description Food Processing/-Preparation
26. Checklist Food Processing/-Preparation
27. Group Description Retail – Bulk Goods
28. Checklist Retail – Bulk Goods (Headquarters)
29. Checklist Retail - Bulk goods (Branch)

Part 5 Protocols and Confirmations

30. Grinding and Mixing Protocol
31. VLOG Incident Sheet Feed Manufacturing and Logistics
32. VLOG Incident Sheet Matrix Organiser
33. VLOG Incident Sheet Agriculture and Animal Trade
34. VLOG Incident Sheet Agricultural Group Organisation
35. VLOG Incident Sheet Food Processing, Logistics and Retail

Literature

- Guideline for the Control of GMOs in feed (German: Leitfaden zur Kontrolle von GVO in Tierfutter – version of November 2011). Monitoring of the production, of handling, of use and of bringing to market of feed in connection with genetically modified organisms (GMOs). Policy guidelines for the implementation of legal regulations. Developed by the GMOs in Feed Project Group (PG GVO) of the Agricultural Employers Association (LAV) Working Group on Feed, with the participation of the Federal Government and The Association of German Agricultural Investigation and Research Institutions (VDLUFA) – also available in English
- Sampling of feed for the test of GMO components authorised in the EU within the framework of an examination of compulsory labelling; compiled by the Working Group PCR Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes (VDLUFA), dated July 2010 – available in German only
- Concept of test of genetically modified feed. Working paper of the Working Group PCR Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes (VDLUFA), dated February 2011 – available in German only
- Praxishandbuch “Bio-Produkte ohne Gentechnik” (Practical Handbook “Organic Products without Genetic Engineering” – in German – from the German Association of Organic Farmers, Food Processors and Traders (Bund Ökologische Lebensmittelwirtschaft – BÖLW), Ökoinstitut and the Research Institute for Biological Agriculture (Forschungsinstitut für biologischen Landbau – FiBL. <http://boelw.de/themen/gentechnik/bioxgen/> - available in German only
- Legal opinion (17 pages, in German) by [GGSC], a Berlin law firm commissioned by VLOG, dated 23 November 2015 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/ - available in German only

Data protection & Privacy

VLOG undertakes to handle the personal data of its contracting partners carefully and in accordance with the data protection provisions of the German Data Protection Act (DSG) and the General Data Protection Regulation (GDPR). The persons responsible for data processing at VLOG comply with all required technical and organisational measures to ensure data security. Personal data of which VLOG becomes aware in the course of the contractual relationships is processed exclusively in order to discharge this contractual relationship. The following data categories are processed:

- Master data (e.g. name, address, contact information, legal representatives, company domicile)
- Operational data
- Contract data
- Correspondence

VLOG only processes and stores personal data for as long as necessary in order to fulfil the contractual obligations. After the obligations have lapsed, the data is blocked or deleted.

Statutory retention obligations may apply additionally, such as retention obligations under commercial or tax law (e.g. Commercial Code, Tax Code). Insofar as such retention obligations apply, the data is blocked or deleted at the end of these obligatory retention periods.