

# **“Ohne Gentechnik” Production and Certification Standard**

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Verband Lebensmittel ohne Gentechnik e.V.  
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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 word mark "VLOG geprüft".

In addition to agricultural businesses 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). At the request 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 association members vis-a-vis regulators, government, media, society at large as well as 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 licensed product/product to be licensed 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 use a translated version that was developed by oneself. Products may only be placed on the market with a translated seal designation 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 Word Mark and the “VLOG geprüft” Seal for Feed

In order to explicitly indicate on the package and/or the bill of lading accompanying a VLOG-certified 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 its suitability for “ohne Gentechnik” food production the VLOG Standard requires binding labelling with the word mark “VLOG geprüft” or, alternatively, for VLOG-certified feed, with the word/design mark (seal, see Figure 2) “VLOG geprüft” (see Chap. B 3.7 or C 4.3). The consent of VLOGowner of the trademark rights, is a requirement for the use of the word mark and the word/design mark. VLOG issues licenses to use the “VLOG geprüft” word mark free of charge; for licences to use the “VLOG geprüft” seal it charges a fee. Use must be based on certification under this Standard or a standard recognised as its equivalent and – for use of the seal – the conclusion of a separate licence agreement between the feed distributor and VLOG.

An English version of the seal (“VLOG verified”) is available. No other translations of the seal 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. 2018/848 of the European Parliament and of the Council on Organic production and labelling of organic products and repealing Regulation (EC) No. 834/2007 of the European Council, dated 30 May 2018
- 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](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 requirement of 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. However, the use of the unitary “Ohne GenTechnik” seal (Figure 1) must be requested from VLOG (see Chapter A 1.2.1).

The requirements for raw materials to qualify for “ohne Gentechnik” 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. 2018/848.

Feed for use in the system of “Ohne Gentechnik” production 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 for the labelling 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. Businesses outside the EU may be certified only after consultation with VLOG.

### **A 2.1 Definition of the 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.

The stages used in the Standard, including a list of the sub-stages, are as follows:

- 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 feed

(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))

- Matrix organisation (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 feed Fehler! Textmarke nicht definiert.
- 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:

#### Document audit:

Auditing of business documents (e.g., process and work instructions, delivery slips) as part of the expansion of certification in agriculture (see Chap. A 3.2). Document audits may only be performed if the agricultural business meets certain criteria (see Chap. E 2.2).

#### 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 prerequisite and requirements are met.

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

- Stages of Logistics, Feed manufacturing, Group organisation Agriculture, Matrix organisation, 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 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 VLOG-specific 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 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 decided by the relevant certification body. The latter will also decide, in consultation with the business, whether the audit of the requirements must be performed on-site or whether an audit of all the relevant documents/records will suffice.

If the requirements were met, the VLOG certificate or the scope of application will be amended to include the new product groups, processes, etc. If no complete on-site audit was performed, the amended certificate will expire at the same time as the certificate for the previous routine 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 required documents must be fully completed.

**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 or review 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 business still meets the requirements of the VLOG Standard, the business will be recertified.

Each business is responsible for updating the own certification and for having the routine audit performed in a timely manner. 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.

## 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 businesses): For requirements and procedure see Chapter F 2
- Group certification in retail (for associated branch operations): For requirements and procedure see Chapter H 2
- Expansion certification in agriculture (to expand an existing VLOG certification of an agricultural business by adding one or more new areas of application or incorporating one or more new areas of application into a VLOG group certification of an agricultural business (e.g., raw milk): For requirements see chapter E 2.2.

### 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.



*Explanation: The audit of an external service provider subject to certification may only be performed on the premises of the external service provider as an on-site audit by a VLOG-recognised certification body. A (supplier) audit by the VLOG-certified business does not meet the requirement of an on-site audit by the certification body.*

The basis for the audit is

- either a written contractual agreement between the client and contractor, or
- an independent certification agreement between the contractor and 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 VLOG-stage and risk category or risk 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). The agreement between the client and contractor must state the details of the outsourced activity, its scope as well as the contractor's obligation to comply with the current VLOG Standard.



*Explanation: It is the responsibility of the VLOG-recognised certification body either to document the audit of the service provider on the checklist for the VLOG-certified business or to fill out a separate VLOG checklist for the external service provider.*

If the contractor has an independent certification agreement, 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 Certification<sup>1</sup>**

The following requirements must be met before the beginning of the audit/the auditing process:

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



*Explanation: A certificate can only be issued if there is a Standard Usage Agreement counter-signed by VLOG.*

## **A 3.3 Applying for Certification**

The business applies for certification with a VLOG-recognised certification body and thereby specifies the desired scope of applicability (stage/sub-stage/product group) which is to be certified. 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, food, feed, or services (e.g. “trade in xy (product group)”, “packaging of eggs”).

The scope or scopes of applicability listed on the VLOG certificate is defined in accordance with Annex (12). It is possible to specify the defined area of applicability in addition on the certificate (e.g. specific product information based on specific customer requests). Product-specific information (such as the brand names of feeds or other products) may not be named on the certificate but must be listed separately in an annex.

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

If the business applies for the inclusion of new product groups, processes, etc. within the VLOG scope of applicability of the certificate, this must be done through a routine audit (early, as necessary), an

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<sup>1</sup> Requirements for Group- and Matrix Certification see Chapter D 2.1, F 2.1, H 2.1

expansion audit or, in the case of agricultural businesses, on the basis of a document audit (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 of the business. This includes 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 auditor<sup>2</sup> 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.
- 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).
- 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 by the auditor and in the checklist by the auditor and evaluator, as necessary.

### 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. Furthermore, 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 in the audit
- Explanation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule

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<sup>2</sup> and/or group or matrix organizer, in the case of group or matrix certifications

**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/organisational structure, quality management system, bills of lading)
- Verification of compliance with the Standard requirements (e.g. labelling of raw materials/feed, risk management)
- 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. segregation of goods flows, risk analysis)
- Interview of staff
- As provided for and/or in the case of suspected non-compliance, sampling and testing, as necessary

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 through 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 business.

**Final discussion:**

- Summary of identified deviations and preliminary result

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

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 according to the four-eye principle 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 Compliance of the 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
<b>A</b>	Full compliance with a requirement	10 points
<b>B</b>	Minor to moderate deviations from the requirement	5 points
<b>C</b>	Non-compliance or major deviation from the requirement	- 10 points
<b>N.A.</b>	Not applicable	-
<b>Risk</b>	Major deviation <b>or breach</b> , meaning that a risk to “Ohne Gentechnik”/“VLOG geprüft” labelling cannot be ruled out	- 15 % of total points <sup>3</sup>
<b>KO</b>	Requirements with a critical impact on “Ohne Gentechnik”/“VLOG geprüft” labelling in case of non-compliance	Audit not passed

**Table 1: Evaluation of requirements**

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 criteria 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 and breaches (B and C grading, 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 and breaches 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 breaches 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 in Chapter A 3.9.2 and/or Annex (10) apply if the business is sanctioned and/or in connection with corrective actions.

<sup>3</sup> 15% of the points total will be deducted for each criterion classified as a risk.



*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 audit results are evaluated on the basis of the points attained, as determined in accordance with Chapter A 3.9.

Audit results	Status	Certificate, measures
<ul style="list-style-type: none"> <li>• More than 75 % of the maximum points</li> <li>• No KO grading</li> </ul>	passed	<ul style="list-style-type: none"> <li>• VLOG certificate will be issued</li> </ul>
<ul style="list-style-type: none"> <li>• More than 75 % of the maximum points</li> <li>• No KO grading</li> <li>• One risk grading</li> </ul>	passed/not passed	<ul style="list-style-type: none"> <li>• Routine audit only: decision of the certification body about suspending the certificate, depending on the severity and relevance of the risk of grading</li> <li>• VLOG certificate will not be issued until corrective actions have been implemented and reviewed</li> <li>• Certification body decides whether a follow-up audit is necessary</li> </ul>
<u>Only for document audit (expansion certification in agriculture)</u> <ul style="list-style-type: none"> <li>• No KO grading</li> <li>• “A” grade for the facility description requirement</li> </ul>	passed	<ul style="list-style-type: none"> <li>• Issuance of the VLOG certificate or inclusion in the VLOG group</li> </ul>
<ul style="list-style-type: none"> <li>• Less than 75 % of the maximum points</li> <li>• No KO grading</li> </ul>	not passed	<ul style="list-style-type: none"> <li>• No VLOG certificate will be issued or, for group members or matrix members, no inclusion in the certification of the group or matrix organiser</li> <li>• The certification body notifies VLOG within 2 working days about failure to pass audit (does not apply to group or matrix members who did not pass the audits)</li> <li>• A new routine audit must be performed</li> </ul>
<ul style="list-style-type: none"> <li>• One or more KO gradings</li> </ul>	not passed	<ul style="list-style-type: none"> <li>• No VLOG certificate will be issued or, for group members or matrix members, no inclusion in the certification of the group or matrix organiser</li> <li>• Certification body notifies VLOG about the KO grading within 2 working days (does not apply to audit of group or matrix members who did not pass)</li> </ul>

Audit results	Status	Certificate, measures
		<p>including notice of whether a new routine audit or a document audit will be performed at a later date</p> <ul style="list-style-type: none"> <li>• Certification body must suspend the current VLOG certificate within 2 working days or the group or matrix member must be removed from the list of members or sites</li> <li>• The business must implement the required corrective actions before the VLOG certificate is re-issued or before it will be added back to the list of members or sites</li> <li>• A new routine audit must be performed. If the sole reason for KO evaluation was the lack of documentation, a document inspection can be performed instead. The decision whether a new routine audit or a document inspection must be performed is the responsibility of the certification body.</li> </ul>

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” seal and/or the “VLOG geprüft” word mark or the “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.

### 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 audit<sup>4</sup>. 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 (except for the "Ohne GenTechnik" and "VLOG geprüft" seals) are permitted 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).

Exceptions to this are to be handled as follows:

#### **Logistics Stage:**

For VLOG-certified mobile grinding and mixing facilities simultaneously certified under the guidelines of the QS system:

- If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 years), the validity period of the VLOG certificate may extend no longer than the end of the second following year (relative to the date of the VLOG audit).

#### **Agriculture Stage:**

For individual VLOG-certified businesses at the Agriculture Stage which are simultaneously certified for another area of application in a VLOG group:

- The validity period of the VLOG individual certification is to be based on the audit interval according to Chap. F 2.4 and may extend no longer than the end of the year in which the next routine audit must be performed at the latest. Therefore, the audit interval is dependent on the risk category of the business or the scope of application of the individual certification (see Chap. E 2.1 or E 2.2).

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<sup>4</sup> 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

**For VLOG-certified livestock traders/transporters which are simultaneously certified under the guidelines of the QS system:**

- If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 or 3 years), the validity period of the VLOG certificate may extend no longer than the end of the second or third following year (relative to the date of the VLOG audit).

#### **A 3.11.4 Termination of the audit agreement before the end of the period of validity of the certificate**

If the audit agreement is terminated (without a notice period) before the end of the period of validity of the certificate, the VLOG certificate will be withdrawn by the competent certification body.

#### **A 3.11.5 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 or change of business name occurs at a VLOG-certified business or 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.

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 each 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. Upon request by the new certification body, 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 organisation.

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 organisation 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 required sampling, if applicable, within the scope of Verification 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 or matrix 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



*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/SRAE>.*

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Sub-stage Transport:</b> 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"> <li>• Transport is <u>not</u> integrated into the risk management of a VLOG-certified business.</li> <li>• <u>No</u> agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the carrier and the certified business.</li> </ul>	<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"> <li>• Order placed by a VLOG-certified business</li> <li>• Transport is integrated into the risk management of a VLOG-certified business. There is adequate proof of integration.</li> <li>• An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the carrier and the certified business.</li> </ul>	B 1-B 3

	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
<b>Sub-stage Storage/handling:</b> 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>B 1-B 4</b>
<b>Sub-stage Trading:</b> 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

	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 material which can be tested for GMOs, 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

	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"> <li>The trader issues delivery slips of its own for certified goods with the “VLOG” label and/or</li> <li>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</li> </ul>	<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"> <li>The goods are certified in accordance with the VLOG Standard</li> <li>The originating processing business is listed on the delivery slips</li> <li>The certified goods are labelled “VLOG” on the delivery slip</li> <li>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.</li> <li>After loading, the vehicle tank, <b>container, etc.</b> is sealed by employees of the issuing processing business</li> </ul>	B 1-B 3, B 5
		For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.	
		For trading of sacked/tamper resistant packaged food.	
<b>Sub-stage Drop shipping:</b> 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

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	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
Food	For drop shipping of bulk VLOG-certified food/ingredients.	For drop shipping 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 6
	For sealed drop shipping of VLOG-certified food between two VLOG-certified businesses, provided that: <ul style="list-style-type: none"> <li>• The drop shipper issues delivery slips of its own for certified goods with the “VLOG” label and/or</li> <li>• The drop shipper commissions non-VLOG-certified carriers or the transport is not included in the risk management of the VLOG-certified business that commissions the transport</li> </ul>	For drop shipping of sealed VLOG-certified food between two VLOG-certified food businesses, provided that all of the following conditions are met: <ul style="list-style-type: none"> <li>• The goods are certified in accordance with the VLOG Standard</li> <li>• The originating processing business is listed on the delivery slips</li> <li>• The certified goods are labelled “VLOG” on the delivery slip</li> <li>• 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.</li> <li>• After loading, the vehicle tank, container, etc. is sealed by employees of the originating processing business</li> </ul>	B 1-B 3, B 6
	For drop shipping of bulk VLOG-certified food with direct transport from the VLOG-certified agricultural business to the VLOG-certified buyer (e.g., by milk tanker), provided that at least one of the following conditions is <del>not</del> met:	For drop shipping of bulk VLOG-certified food with direct transport from the VLOG-certified agricultural business to the VLOG-certified buyer (e.g., by milk tanker), provided that all of the following conditions are met:	B 1-B 3, B 6

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	<ul style="list-style-type: none"> <li>The goods are not certified in accordance with the VLOG Standard</li> <li>The purchasing processing facility cannot verify that the goods exclusively come from VLOG-certified businesses</li> <li>The processing facility does not have currently valid VLOG certificates (or certificates in accordance with F 2.2.6)</li> <li>The carrier is not VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B1.</li> </ul>	<ul style="list-style-type: none"> <li>The goods are certified in accordance with the VLOG Standard</li> <li>The purchasing processing facility can verify, based on available information/documentation, that the goods exclusively come from VLOG-certified businesses (e.g., verifiable tour)</li> <li>The processing business has currently valid VLOG certificates (or certificates in accordance with F 2.2.6)</li> <li>The carrier is VLOG-certified or integrated in the risk management of a VLOG-certified business in accordance with B1. There is adequate proof of integration.</li> </ul>	
		For drop shipping of sacked/tamper resistant packaged VLOG-certified food/ingredients (e.g., as soon as they have been packaged in end consumer packaging.)	
<b>Sub-stage Private labelling of feed:</b> 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.			
<b>Feed</b>	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 **Word mark** or seal according to chapter A 1.2.2)

Added

## **B 2 Specific information about the Certification Procedure**

### **B 2.1 Audit Frequency**

In the case of individual certification in the Logistics stage one routine audit per calendar year is performed.



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

### **B 2.2 Knock Out (KO) criteria**

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 organisations, the matrix organiser are promptly informed about major changes pertaining to VLOG certification.



*Explanation: Information transmitted in electronic form will be accepted. The up-to-date facility description, annexes (VLOG templates or own documents with equivalent content) 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. 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 are, 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 Logistics, C 1 Feed manufacturing, G 1 Food processing/preparation) 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 word mark “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.

When using the word mark, care must be taken to avoid any resemblance of its visual representation to the “VLOG geprüft” seal.



*Explanation: VLOG recommends the following wording for labelling feed exempt from labelling but 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 persons in charge 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 per calendar 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, handling, trading, drop shipping or “VLOG geprüft”/“VLOG” storage 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 per calendar 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.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

### **B 3.15 Internal Audits**

Each calendar year, the business must perform 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 the identification “VLOG geprüft” and/or the “VLOG geprüft” seal or “VLOG” and/or the “Ohne GenTechnik” seal.
- the VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

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 or test any feed/raw materials/products.



*Explanation: The VLOG homepage offers an assessment aid to determine the suitability raw materials and products for testing: [https://www.ohnegentechnik.org/gmo\\_testing\\_suitability](https://www.ohnegentechnik.org/gmo_testing_suitability).*

### B 5.2.2 Frequency of Sampling and Testing

Each calendar year, the 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

List of VLOG products at site  List of all products at the site	Minimum number of samples + tests at “VLOG geprüft” outgoing goods <sup>5, 6</sup> per calendar year	
	Bulk “VLOG geprüft” <sup>7, 8</sup> -feed	VLOG bagged goods
No bulk feed subject to compulsory labelling at site	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) sample + test

<sup>5</sup> All feed quantities relate exclusively to “VLOG geprüft” feed or feed that is to be labelled as “VLOG geprüft”.

<sup>6</sup> 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.

<sup>7</sup> All feed quantities relate exclusively to “VLOG geprüft” feed or feed that is to be labelled as “VLOG geprüft”.

<sup>8</sup> 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.

<div> <div>List of VLOG products at site</div> <div>List of all products at the site</div> </div>	Minimum number of samples + tests at “VLOG geprüft” outgoing goods <sup>5, 6</sup> per calendar year	
feed subject to compulsory labelling at site	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) sample + test

Table 3: Minimum of sampling + testing at the Trading of Feed sub-stage per calendar year

#### Trading of VLOG food (raw materials/products):

List of all bulk raw materials/products handled at the site <sup>9</sup>	Annual Minimum number of samples + tests of outgoing VLOG goods per calendar year
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: Minimum sampling + testing at the Trading of Food sub-stage per calendar year



*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).

<sup>9</sup> The tamper-proof packaging of raw materials/products has no influence on the number of tests

The handling of the affected feed, raw materials and products in the business must follow the specifications of Chapter F 3.7.

## 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 calendar 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). Conversion is only feasible for feed material that can be tested for GMOs.



*Explanation: If testing is mandatory, the drop shipper may convert feed only if the sampling and testing of the feed was done according to Chapter B 7.2.*

### B 7.1 Specific Requirements for Risk Management

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

- 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: The document “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: [https://www.ohnegenteknik.org/risk-prone\\_feed](https://www.ohnegenteknik.org/risk-prone_feed).*

### 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 calendar 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	Minimum sampling + testing in “VLOG geprüft” outgoing goods inspection (trade incl. conversion) per calendar year
No bulk subject to compulsory labelling at site	For every batch of feed material graded as risk-prone that is to be	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	



<b>List of all products at site</b>	<b>Area</b>	<b>Sampling + testing at “VLOG geprüft” incoming goods</b>	<b>Minimum sampling + testing in “VLOG geprüft” outgoing goods inspection (trade incl. conversion) per calendar year</b>
		converted: 1 sample + test	for every additional 100,000 t or part thereof: 2 additional samples + tests
	<b>Bulk feed subject to compulsory labelling at site</b>	For every batch of feed material graded as risk-prone that is to be converted: 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
	<b>Exclusive drop shipper or shipper who only transports the goods but does not store or tranship them</b>	For every batch of feed material graded as risk-prone that is 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: Monitoring with at least one sampling + test per year. 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: Minimum number of samples + tests for incorporation into “VLOG geprüft” quality of feed material not subject to compulsory labelling per calendar year

## 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 per calendar 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 “Ohne Gentechnik” 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.

### **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



*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/SRAE>.*

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Sub-stage Feed manufacturing/processing:</b> 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 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
<b>Sub-stage Mobile grinding and mixing facility:</b> Commercial, multi-operation production of feed using mobile equipment in agricultural businesses.			
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

A routine audit is to be carried out each calendar year.



*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) criteria

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 organisations 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 (VLOG templates or own documents with equivalent content) 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. 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 are, 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: [https://www.ohnegentechnik.org/risk-prone\\_feed](https://www.ohnegentechnik.org/risk-prone_feed).*

- 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 Logistics, C 1 Feed manufacturing) 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 per calendar year.

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 feed that is exempt from mandatory labelling but is not VLOG-certified: “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 persons in charge 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 per calendar 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 per calendar 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.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

### C 3.15 Internal Audits

Each calendar year, the business must perform an internal audit that at a minimum covers 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.



*Explanation: If the requirements for internal auditors cannot be met, e.g., due to the size of the business, an external auditor must be commissioned to perform the internal audit.*

*Exception: An external counter-check can be waived for businesses with  $\leq 1,000$  tonnes of feed material produced per calendar year (based on dry weight) and for mobile grinding and mixing facilities.*

## **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: [https://www.ohnegentechnik.org/gmo\\_testing\\_suitability](https://www.ohnegentechnik.org/gmo_testing_suitability).*

### C 4.2.2 Sampling and Testing Frequency

Each calendar year, the 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.

Production at site	Area	Sampling + testing at “VLOG geprüft” incoming goods (raw materials)	Minimum number of samples + tests at “VLOG geprüft” outgoing goods <sup>10</sup> per calendar year
Entire production 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: Minimum sampling + testing at the Feed Manufacturing Sub-stage per calendar year<sup>11</sup>

### 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 word mark “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.

When using the word mark, care must be taken to avoid any resemblance of its visual representation to the “VLOG geprüft” seal.

<sup>10</sup> 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

<sup>11</sup> 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, Conversion of feed material to “VLOG geprüft” and Private Labelling of Feed**

If the business performs activities in the area of transport, storage, handling, trading, drop shipping, conversion of feed material to “VLOG geprüft” 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 “Ohne Gentechnik” 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 “Ohne Gentechnik” 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 “Ohne Gentechnik” production and is then repeated at least every 5 years and/or 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 business 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”.

## **Part D Matrix Organisation for the Logistics and Feed Manufacturing Stages**

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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 organisation is available for businesses with at least two sites as well as for the joint certification of multiple businesses with their sites.

Matrix organisation 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 organisation.

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

## D 2 Specific information about the Certification Procedure

### D 2.1 Conditions and Requirements for the Certification

As a condition for the matrix certification there must exist:

- A contract between the matrix organiser and a VLOG-recognised certification body and
- A signed Standard Usage Agreement<sup>12</sup> between the matrix organiser and VLOG including the VLOG ID issued by the 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.*
- *“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.*

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<sup>12</sup> Known as “Certification Agreement” until 20 June 2017.

- *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.*

## 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 2.2.7).

- 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 for each site to the certification body.

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.



*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. The certification decision is 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.

#### **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 organisation. 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 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 certification body is responsible for and monitors the compliance with audit dates. This is to be done with the support of the matrix organiser. The matrix organiser is responsible for the implementation of corrective actions at the sites. The certification body is responsible for monitoring the effectiveness of the corrective actions.



*Explanation: At the start of the new auditing season, the matrix organiser must coordinate the audits for matrix members/sites planned for the year with the certification body.*

In the case of logistics and feed manufacturing matrix organisations, the certification body is to perform an audit of the matrix organiser each calendar 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 each calendar year by the certification body
- All matrix sites of the stages of Logistics, Mobile Grinding and Mixing Facilities must be audited by the certification body within 3 years (i.e., in the third following calendar year at the latest).

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) criteria**

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 3.7)
- Crisis management (D 3.10)

## **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 the matrix certification organisation 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 the matrix organisation is to be on file and up to date. At a minimum, it must contain the following information:

- Address/clear identification of the site, name of business associated with the site.
- 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.

At least once per calendar year, there must be a review of the risk management, including a review of the matrix description, e.g. as part of an internal audit.

## **D 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 (cf. Chapter D 3.3).

For activities requiring certification (see Chapter B 1 Logistics, C 1 Feed Manufacturing) in the areas of feed manufacturing, transport, storage, handling and/or trading and 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.

## **D 3.5 Implementation of the Requirements for Sampling and Testing**

### **Sampling and testing plan**

The matrix organiser is responsible for creating a sampling and testing plan for the matrix sites that defines the risk-based sampling and GMO testing of feed 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 calendar 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 3.6 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 per calendar 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.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

## D 3.7 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 3.8 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 3.9 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 3.10 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 persons in charge 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 per calendar year with regard to practicality, functionality and immediate implementation, with results documented.

## **D 3.11 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 3.12 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to the matrix organisation 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 3.13 Internal Audit

The matrix organiser must perform at least one internal audit per calendar year at each matrix site, which at a minimum covers the general and site-specific Standard requirements of the stages of Matrix Organisation and Logistics or Feed Manufacturing. The matrix organiser is subject to at least one internal audit per calendar year, which at a minimum covers the general and matrix organiser-specific Standard requirements of the Matrix Organisation 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



*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/SRAE>.*

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
<b>Animal production Sub-stage:</b> The production of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.			
<b>Primary production of food of animal origin (e.g. milk, meat, eggs, honey, fish...)</b>	For any agricultural business (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"> <li>• Apiary: <math>\geq 50</math> beehives</li> <li>• Egg-producing operations: <math>\geq 350</math> animal spaces</li> <li>• Milk production: annually <math>\geq 10</math> cows</li> </ul>	For any agricultural business 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"> <li>• Apiary: <math>&lt; 50</math> beehives</li> <li>• Egg-producing operations: <math>&lt; 350</math> animal spaces</li> <li>• Milk production: annually <math>&lt; 10</math> cows</li> </ul> <p><i>A document check is necessary.*</i></p>	E 1-E 4, J 1 if applicable
<b>Rearing of animals</b>			
<b>Rearing of laying hens</b>	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

	<b>Certification required according to VLOG Standard</b>	<b>Approval by document check, registration and/or proof, Annex (2)</b>	<b>Standard requirements</b>
	feeding conversion period, if they fulfil the following business sizes: <ul style="list-style-type: none"> <li>Rearing of laying hens: <math>\geq \leq</math> 700 animal spaces</li> </ul>	minimum feeding conversion period, if they fulfil the following business sizes: <ul style="list-style-type: none"> <li>Rearing of laying hens: &lt; 700 animal spaces</li> </ul> <i>A document check is necessary. *</i>	
<b>Rearing of piglets</b>	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"> <li>The facility is not registered with VLOG as a piglet rearing facility and</li> <li>business fulfils the following business size: <math>\geq</math> 250 animal spaces for piglets under 30 kg</li> </ul>	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"> <li>&lt; 250 animal spaces for piglets under 30 kg</li> </ul> <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"> <li>The facility is not registered with VLOG as a piglet rearing facility</li> </ul> <i>Please contact the VLOG head office for information regarding registration.</i>  <i>Proof in accordance with Annex (2) is required (cf. chapter E 4.7)</i>	E 1-E 4, J 1 if applicable

	<b>Certification required according to VLOG Standard</b>	<b>Approval by document check, registration and/or proof, Annex (2)</b>	<b>Standard requirements</b>
<b>Rearing of cattle and other ruminants for dairy and meat production</b>	<p>For agricultural businesses that sell gestating cows<sup>13</sup> (dry cows) 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"> <li>• ≥ 20 animal spaces in ruminant rearing/maintenance of gestating cows (dry cows)</li> </ul>	<p>For agricultural businesses that sell <u>gestating cows (dry cows)</u> 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"> <li>• &lt; 20 animal spaces in ruminant rearing/maintenance of gestating cows (dry cows)</li> </ul> <p><i>A document check is required.*</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.<sup>14</sup></p> <p><i>Proof in accordance with Annex 2 is required (see Chapter E 4.7)</i></p>	E 1-E 4, J 1 if applicable
<b>Rearing of other types of animals</b>	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

<sup>13</sup> Gestating cows (dry cows): milk-producing animal (e.g. a cow) which is not milked for the time between two lactation periods.

<sup>14</sup> 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.

	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 business is smaller than one of the aforementioned business sizes, a document check is necessary. Please contact the VLOG head office in this regard.			
Sub-stage of 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.	
Sub-stage of Animal transport/livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transloading 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



	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
	<p>For animal transport of VLOG animals, if at least one of the following three requirements is fulfilled:</p> <ul style="list-style-type: none"> <li>• <u>No</u> commissioning by a VLOG certified business.</li> <li>• Transport is <u>not</u> integrated into the risk management of the VLOG certified business.</li> <li>• There is <u>no</u> agreement in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard.</li> </ul>	<p>Applies to animal transport, provided that all of the following three conditions are met:</p> <ul style="list-style-type: none"> <li>• Commissioning by a VLOG certified business.</li> <li>• Transport is integrated into the risk management of the VLOG certified business.</li> <li>• An agreement is in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard.</li> </ul>	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 Specific information about the Certification Procedure

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



*Explanation: Guidance on how to grade agricultural businesses into the correct risk categories is available on the VLOG website: [https://www.ohnegentechnik.org/risk\\_grading\\_agriculture](https://www.ohnegentechnik.org/risk_grading_agriculture).*

#### General

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 a business with various areas of application** (e.g., cattle – cow's milk and cattle – livestock for fattening, cattle – cow's milk and pigs – fattening pigs):

If several areas of application in the business are part of a VLOG certification, risk grading is performed as follows:

- either across all areas of application (one risk category per business – and only the highest/strictest risk category shall apply) or
- separately for individual areas of application under the following conditions (one risk category per area of application).

A business may only be graded into multiple risk categories if all of the following requirements are met:

- the business is a member of a VLOG group certification for one area of application,
- the areas of application are completely separate from each other (completely separate facilities/feeding equipment/machines in contact with feed), and
- all four grading criteria in the following table are observed for each area of application

These conditions being met, the different risk categories for the individual areas of application result in different audit intervals (see Chapter E 2.2 in combination with F 2.4).

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
<b>GMO feed within the business</b>	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> <li>No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site.</li> <li>Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.</li> </ul>	<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 site<sup>15</sup>.</p>
<b>Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn</b>	<p>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.</p>		<p>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).</p>

<sup>15</sup> 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
<b>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 4.2)</b>	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.		<p>Potentially risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.</p> <p>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).</p>
<b>Use of:</b> <ul style="list-style-type: none"> <li>mobile grinding and mixing systems used by several businesses or</li> <li>stationary grinding and/or mixing facilities of agricultural selfmixers</li> </ul>	<p>Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard.</p> <p>Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.</p>	<p>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.</p> <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, Bio<sup>16</sup>).</p>	<p>Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard.</p> <p>Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.</p> <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>

<sup>16</sup> 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

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
		<ul style="list-style-type: none"><li>Measures to prevent carryover of GMO are described in the QM manual of the facility operator.</li></ul>	

## E 2.2 Conditions and Requirements for a Document Audit

A document audit can only be performed as part of an expansion certification in agriculture (see Chapter A 3.2) if all of the following requirements are met:

Criterion	Requirement
<b>Change of risk category</b>	The risk category of all VLOG areas of application remains the same or is diminished. Alternatively, the risk category can be graded separately for the individual areas of application under certain conditions (see Chapter E 2.1).
<b>Site/ operating unit</b>	Sites/operating units of the new area of application were audited on site or as a remote audit in 2020/2021 by a VLOG-recognised certification body in the previous VLOG-group/or routine audit.
<b>Additional criteria for facilities that have hitherto been organised into a VLOG group or certified:</b>	
<b>Previous on-site audit by the certification body</b>	The group member was already audited on site by a VLOG-recognised certification body.
<b>Data approval by the previous group organiser</b>	The group organiser agrees in writing to the use of the audit documents (current audit data) for the expansion certification in agriculture.

Table 7: Requirements for performing a document audit as part of an expansion certification in agriculture

If the agricultural facility does not meet the requirements set forth in Table 1, the expansion certification in agriculture cannot be performed on the basis of a document audit. In such cases, the new area or areas of application must be certified by means of an on-site expansion audit or (possibly an early) routine audit (see Chap. A 3.1).

## E 2.3 Audit Frequency

The following audit intervals are mandatory depending on the type of certification or combination of certifications:

### Individual certification:

Each calendar year, one routine audit is carried out for individual certification of agricultural businesses.

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.

**Agricultural group certification:**

If the agricultural business is a member of a group certification in agriculture, the audit must be performed in accordance with Chapter F 2.4.

**Combination of individual certification and group certification in agriculture or combination of multiple group certifications with various areas of application per business:**

If an agricultural business is certified as part of a VLOG group for one area of application and is individually certified for another area of application, the audit interval is based on the risk grading of the business under Chapter F 2.4. Under certain conditions, different areas of application can be graded into different risk categories, thereby enabling different audit intervals (see Chap. E 2.1).

**E 2.4 Knock Out (KO) criteria**

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 3.8)
- Incoming goods inspection (E 4.6, E 5.1, E 6.1)
- Compliance with the minimum feeding conversion period (E 4.7)
- Segregation of goods flows/exclusion of carryover from GMO feed, commingling and swapping (E 4.8, E 5.2, E 6.3)

**E 3 General Requirements****E 3.1 Facility Description**

The facility description (Annex (20) or (21)) with all relevant annexes 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 (VLOG templates or own documents with equivalent content) 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. 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 are, 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 small facilities<sup>17</sup>, this may be done as part of the facility description.*

## E 3.3 Risk Management



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

### 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)

### Risk management



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

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.

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.

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<sup>17</sup> For definition see Glossary



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

If:

- machines/facilities for feed cultivation, feed processing or manufacturing are used jointly by several agricultural businesses, 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 Logistics, C 1 Feed Manufacturing, E 1 Agriculture– Rearing of Animals), an audit or certification of the service provider is to be performed in accordance with Chapter A 3.2.1.

### **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 “Ohne Gentechnik” - “VLOG” production 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/](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 businesses 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 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 persons in charge 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 businesses 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 business must notify the group organiser. Further measures will be agreed upon with the group organiser.

## E 3.9 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 3.10 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 3.11 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 per calendar 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 businesses (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.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohne gentechnik.org/staff\\_training](https://www.ohne Gentechnik.org/staff_training).*

## **E 3.12 Self-monitoring**

An internal self-monitoring is to be performed once per calendar 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 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/corn<sup>18</sup>, sugar beet<sup>19</sup>, 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

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<sup>18</sup> Dried maize/corn grains can be graded as non-risk-prone feed if the following conditions are met:

- Maize/corn that can be proven to have been cultivated in Denmark, Germany, France, Greece, Italy, Croatia, Latvia, Lithuania, Luxemburg, 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.
- TradedThe maize/corn silage made of is purchased directly from the drying facility, and a conclusive confirmation from the drying facility is submitted indicating that the facility only dries goods not subject to compulsory labelling and only processes maize/corn that was demonstrably cultivatedis produced in the above-mentionedforementioned countries .

Maize/corn silage or silage maize/corn can also be classifiedgraded as feed that is not non-risk-prone. This option applies feed if the farmer obtains the feed following conditions are met:

- Verified cultivation of the maize/corn in the aforementioned countries
- Purchased utilising one of the following three options:
  - 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 farmercustomer 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.

<sup>19</sup> Feed produced from sugar beetbeets (e.g., sugar beet chipspulp, pellets, molasses) which can be proven to have been cultivated and, if applicable, processed in the EU or Switzerland are not graded as non-risk-prone feed if the farmer hasfollowing conditions are met:

- Verified cultivation and processing, if any, in the EU or Switzerland,
- submission of a conclusive confirmation from the manufacturer for each shipment confirming that the goods are feed is 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 in the farmer obtainsfeed
- Purchased utilising one of the feed two following options:
  - directly from the manufacturer OR the farmer obtains the feed producer
  - from a drop shipper and the delivery proceeds directly from the manufacturerproducer to the farmercustomer without intermediate storage.

- Compound feed produced from one or more of the feed materials mentioned in Chapter E 4.2 except:
  - Compound feed that is certified in accordance with the VLOG Standard or a recognised equivalent standard

### E 4.3 Feed Ordering

Risk-prone feed that is not VLOG certified (see Chapter E 4.2) 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 4.2 e.g. VLOG certified feed bearing the word mark and/or the “VLOG geprüft” seal) may be used without written orders, without additional contractual agreement and without other accompanying documents.*

### E 4.4 Feed List



*Explanation: For small businesses<sup>20</sup>, a chronologically filed collection of invoices and bills of lading is an alternative to a feed list.*

An up-to-date feed list of the purchased feed must be included in the facility description (cf. Chapter E 3.1), in which all feeds purchased by 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.*

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<sup>20</sup> See Glossary

- *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 business 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.*

## E 4.5 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 4.6 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:

- 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 per calendar year.

### 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 per calendar year.



*Explanation: Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification. The labelling of the warning documents to be duly checked is listed in the following document: <https://www.ohnegentechnik.org/SRAE>.*

### 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 4.7 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 8. The process for complying with the minimum feeding conversion period must be described.

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 <sup>21</sup>	ten weeks
Poultry for egg production	six weeks
Other animal species/categories	from the time of birth/hatching

**Table 8: 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 4.4) 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

- The requirements for the purchase of animals listed in the Table 9 must be followed:

	Criterion	Requirement or proof required
The "Ohne Gentechnik" - compliant feeding period at the previous owner's facility will be counted	Previous owner is VLOG-certified	<ul style="list-style-type: none"> <li>There must be written confirmation, including date, of the time from which the animals verifiably were consistently given "Ohne Gentechnik"-compliant feed until their sale <u>and</u></li> <li>VLOG certification (or certification recognised as equivalent) of the previous owner must be checked regularly, at least once per calendar year</li> </ul>
	Previous owner is <b>not</b> VLOG-certified	<ul style="list-style-type: none"> <li>The rearing facility under E 1 is not subject to certification obligation and</li> <li>There is written confirmation from the previous owner in accordance with Annex (2)</li> </ul>

<sup>21</sup> 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.



	Criterion	Requirement or proof required
		<p>Only relevant for piglet rearing facilities:</p> <p>The rearing business is registered with VLOG and</p> <ul style="list-style-type: none"> <li>• Registration of the rearing business must be checked regularly, at least once per calendar year (registration certificate) and</li> <li>• There is a written confirmation from the previous owner in accordance with Annex (2)</li> </ul>
The "Ohne Gentechnik" - compliant feeding period at the previous owner's facility will <u>not</u> be counted	Previous owner is VLOG-certified or not VLOG-certified	The complete minimum conversion feeding period will be ensured at the buyer's VLOG facility

Table 9: : Criteria and requirements for the purchase of animals



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

### Feeding conversion:



*Explanation: If in addition to "Ohne Gentechnik" feeding other animals are fed in an agricultural business 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.*

### Feed of different qualities:

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

- The agricultural business 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” feeding and feeding with 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).*

#### **Feed mixer vehicles**

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 4.9 Use of Grinding and Mixing Facilities****E 4.9.1 Joint Use of Grinding and Mixing Facilities****E 4.9.1.1 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 business 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 per calendar 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 the “Ohne Gentechnik” 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 4.9.1.2 Specific Measures to Eliminate Carryover of GMO Feed**

The business must define measures in the facility description (cf. E 3.1) 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 4.9.1.3 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 4.9.2 Use of Stationary Grinding and Mixing Facilities**

##### **E 4.9.2.1 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 4.9.2.2 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 4.9.2.3 Specific Measures to Eliminate Carryover of GMO Feed**

Individual measures/requirements are to be derived, documented and implemented according to E 4.8 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 the “Ohne Gentechnik” 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 the “Ohne Gentechnik” 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 4.9.2.4 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 4.10 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.



*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: [https://www.ohnegentechnik.org/gmo\\_testing\\_suitability](https://www.ohnegentechnik.org/gmo_testing_suitability).*

#### E 4.10.1 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 feed<sup>22</sup> (cf. Chapter E 4.2)
- When using a stationary or mobile grinding and mixing facility in accordance with the guidelines in Table 10: Minimum number of tests in the sub-stage of Mobile/Stationary Grinding and Mixing Facility in the respective audit interval

#### E 4.10.2 Sampling and Testing Plan

In individually certified businesses, a written sampling and testing plan must be available that describes risk-based sampling and GMO testing of risk-prone feeds relevant for “Ohne Gentechnik”/“VLOG” 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 and E 4.2).
- 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).

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<sup>22</sup> This also applies to the additional purchase of feed from grinding and mixing facility operators

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

- 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 (incl. temper-resistant and sealed big bags) which are marked with the word mark and/or the seal “VLOG geprüft” seal or certified by a standard recognised as equivalent 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 categories<sup>23</sup>, 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.



*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 business 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 10.

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

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<sup>23</sup> Delivery of risk-prone feed; switch between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling

	<b>The mobile grinding and/or mixing facility is VLOG certified<sup>24</sup></b>	<b>The mobile grinding and/or mixing facility is not VLOG certified</b>	<b>Stationary grinding and/or mixing facility (only for feed used within the farm)</b>
<b>Facility exclusively processes feed not subject to compulsory labelling</b>	Sampling + testing not required	1 test result per audit interval	Sampling + testing not required
<b>Facility also processes feed subject to compulsory labelling</b>	Sampling + 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 10: Minimum number of tests in the sub-stage of Mobile/Stationary Grinding and Mixing Facility in the respective audit interval**

### **E 4.10.3 Sampling and Testing Plan**

In individually certified businesses, a written sampling and testing plan must be available that describes risk-based sampling and GMO testing of risk-prone feeds relevant for “Ohne Gentechnik”/“VLOG” 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 and E 4.2).
- 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.

### **E 4.10.4 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

<sup>24</sup> 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 each calendar year in at least 25 % of the sites with regular feed switching.
  - At least one sample must be taken each calendar year 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 4.11 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 of seeds and seed stock (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 attachment GMO cultivation of the facility description (see E 3.1).





*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 (at least at initial purchase and then once per calendar year).

### **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**

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

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.*

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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.

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>VLOG agricultural group:</b> A VLOG agricultural group is a combination of different businesses or sites (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture. Group certification is available for a business with at least two sites as well as for the joint certification of multiple businesses with their sites.			
<b>Agricultural group organiser, hereinafter group organiser:</b> 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 (sub-stage)	Plant-based food	F 1-F 3
<b>Agricultural group member, hereinafter group member<sup>25</sup>:</b> Agricultural operation/site 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

<sup>25</sup> A group member may only be a member of one VLOG group for a specific area of applicability (e.g. cattle – cow's milk (raw)). If a group member produces animals/animal products for different areas of applicability (e.g. cow's milk (raw) and fast stock), the business may be a group member of different VLOG groups for each area of applicability (cf. expansion certification Agriculture). If a business is a member of a VLOG group, independent certification according to the VLOG Standard is not permissible for the same area of applicability.

## **F 2 Specific information about the Certification Procedure**

### **F 2.1 Conditions and Requirements for the Certification**

As a condition for group certification the must exist:

- A contract between the group organiser and a VLOG recognised certification body and
- A signed Standard Usage Agreement between the group organiser and VLOG<sup>26</sup> including the VLOG-ID issued by VLOG

### **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 2.2.7)

- 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 businesses.
- 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.

#### **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)

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<sup>26</sup> Known as “Certification Agreement” until 20 June 2017.

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 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 (11<sup>th</sup> and 12<sup>th</sup> 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 VLOG certificates.



*Explanation: “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 2.2.6 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 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 certification body is responsible for, and monitors compliance with, audit dates. This is to be done with the support of the group organiser. The group organiser is responsible for the implementation of the corrective actions by the group members. The certification body is responsible for monitoring the effectiveness of the corrective actions.



*Explanation: At the start of the new auditing season, the group organiser must coordinate the group members' planned audits for the year with the certification body.*

In the case of agricultural group certifications, the certification body is to perform an audit of the group organiser each calendar 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 calendar 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 calendar year of the last audit)
- All group members in Risk Category 2 must be audited once per calendar year by the certification body.

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

**Figure 3: Audit intervals of agricultural businesses 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) criteria

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 3.7)
- 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 businesses, 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

The current and complete members list in accordance with Annex (23a) or, for certification laying hens, Annex (23b) must have been submitted.

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

The group organiser must send the current, reduced list of members to VLOG as an Excel file<sup>27</sup> during the period between 01 January and 31 March of every calendar (only the data in the area labelled "Data transfer to VLOG").

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

### Stable space overview (see annex 23c)

Starting in 2023, the group organiser must send a complete stable space overview for group members in accordance with Annex (23b) as Excel file<sup>31</sup> to VLOG between 01 January and 31 March of each calendar year.

- The first transmission must be made between 01 January and 31 March 2023 – based on the data available from facility descriptions or databases
- Transmissions starting in 2024: The stable space overview for all group members must be updated at least with respect to the stable spaces for group members that underwent a VLOG initial or routine audit during the previous year.

### 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.

In individual cases/if there are incidents, anonymised facility descriptions and checklists can be disclosed to VLOG following consultation between the group organiser and the certification body.



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



*Explanation: A group-specific facility description can be created if all the relevant content of the VLOG facility descriptions is included and this is checked by the competent certification bodies.*

## 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

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<sup>27</sup> Or a compatible format coordinated with VLOG

corrective actions and deadlines as instructed by the group organiser. Each group member must sign the declaration of participation/agreement.

### **F 3.2.1 Data Release Statement (only Laying Hens – Eggs Group Organisation)**

The contract or participation statement between the group member (egg producer) and the group organiser must contain a data release statement in accordance with Annex (23e) or be supplemented by it. This data release statement is to be signed by the group member (egg producer).



*Explanation: The laying facility thereby enables the transmission of the VLOG-certified print numbers to VLOG.*

## **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.

At least once per calendar year there must be a review of the risk management, including a review of the group description, e.g. as part of an internal audit.

## **F 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 (cf. Chapter F 3.3).

For activities requiring certification (cf. Chapter B 1 Logistics, E 1 Agriculture, G 1 Food processing/preparation) in the areas of manufacturing, transport, storage, handling and/or trade 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.

## F 3.5 Implementation of the Requirements for Sampling and Testing

### Test frequency

At minimum, the testing results required per Chapter E 4.10 must be submitted for each agricultural group member within the respective audit interval.

### Sampling and testing plan

The group organiser is responsible for creating a sampling and testing plan for the group members that defines the risk-based sampling and GMO testing of feed in the business. 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.

### Evaluation of the analytical data

The group organiser must:

- collect the test results of the group members, and evaluates these at least once per calendar 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.

### Disclosure of test results to VLOG

The group organiser must send a full analysis/overview of the test results in accordance with Annex (23d) as Excel file<sup>31</sup> to VLOG between 01 January and 31 March of each calendar year.

### 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 3.7.



*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 3.6 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 per calendar 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.*

*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

### F 3.7 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 3.8 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 3.9 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 persons in charge 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 per calendar 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 at least one internal audit per calendar year which at a minimum must cover the general and business-specific requirements for the Group Organisation Stage under the Standard. 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



*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/SRAE>.*

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<p><b>Food preparation:</b> 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><b>Food processing:</b> 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 up to the Packaging Stage in end consumer packaging.	For plant-based products which are not to be labelled as “VLOG” or with the “Ohne GenTechnik” seal.	<p>G 1-G 5, J 1</p> <p>G 1- G 5, J 1</p>



	<b>Certification required according to VLOG Standard</b>	<b>Certification not required according to VLOG Standard</b>	<b>Standard requirements</b>
	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).		
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**

A routine audit is to be carried out each calendar year.

### **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 (VLOG templates or own documents with equivalent content), 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. 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 are, 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 Logistics, G 1 Food processing/preparation) in the areas of food processing/food preparation, transport, storage, handling and/or trade that VLOG-certified businesses commission to external 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 used<sup>28</sup>.

- 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 per calendar year.

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 **calendar** 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 per calendar year.

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<sup>28</sup> 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)



*Explanation: Bills of lading for VLOG-certified products in end consumer packaging need not be marked “VLOG” and/or bear the “Ohne GenTechnik” seal.*

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 persons in charge 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 per calendar 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 per calendar 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.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

## **G 3.16 Internal Audits**

The business must perform at least one internal audit per calendar year that at a minimum covers 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**

## **G 4.1 Sampling and Testing**

Risk-based sampling and GMO testing of raw materials and products relevant for “Ohne Gentechnik”/“VLOG” 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:*

[https://www.ohnegentechnik.org/gmo\\_testing\\_suitability](https://www.ohnegentechnik.org/gmo_testing_suitability).

### G 4.1.2 Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in Table 11 each calendar year, 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 per calendar year <sup>29</sup>
0	2 samples + tests
1	6 samples + tests
2	12 samples + tests

**Table 11: Minimum number of samples + tests of “Ohne Gentechnik” incoming goods per calendar year**



*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 11.*

*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. If required, the overview is to

<sup>29</sup> The number of samples relates to the total quantity of raw materials used in the “Ohne Gentechnik” production.

be updated regularly with risk-prone raw materials/ingredients:  
[https://www.ohnegentechnik.org/risik-prone\\_ingredients](https://www.ohnegentechnik.org/risik-prone_ingredients).

## **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/SRAE>.*

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Retail:</b> Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.			
<b>VLOG retail group:</b> 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.			
<b>Retail group organiser, hereinafter group organiser:</b> 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.			
<b>Retail group member, hereinafter group member:</b> 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 VLOG<sup>30</sup>



*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 Follow-up Certification and Monitoring/Audit Intervals

The certification body is responsible for, and monitors compliance with, the audit dates. This is to be done with the support of the group organiser. The group organiser is responsible for the implementation of corrective actions by the group members. The certification body is responsible for monitoring the effectiveness of the corrective actions.



*Explanation: At the start of the new auditing season, the group organiser must coordinate group member's planned tests for the year with the certification body.*

#### Initial certification

Each calendar year, the certification body is to perform an audit of the group organiser and audits group members according to the following random sampling scheme:

- 10 % of the group members per calendar 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.

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<sup>30</sup> Known as “Certification Agreement” until 20 June 2017.

- 10 % of the group members per calendar 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 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**

Each calendar year, 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. 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 <sup>31</sup>
- 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 and ingredients

The retail group description must be kept up to date by the group organiser. The group organiser must promptly notify certification body of internal changes in the business pertaining to the certification. The current retail group description must be available at the retail group organiser and the retail group members.

For 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.*

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<sup>31</sup> 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.

At least once per calendar year there must be a 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 per calendar year.
- 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 per calendar 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.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

### 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 customers<sup>32</sup>

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 persons in charge 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)(34)), of the certification body
- Legal advice (if required)

The crisis management procedure is to be periodically tested internally at least once per calendar 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.

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<sup>32</sup> 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 calendar year.

### 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.



*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

Each calendar year, the group organiser must perform an internal audit in the business of the group organiser and all branches respectively. 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, at least two risk-based random sample checks are to be performed each calendar year 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 and GMO tests” instead.

The Guideline is available for download on the [VLOG home page](#).

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## J 1 Requirements for Commissioning a Test

### J 1.1 Commissioning a VLOG-recognised Laboratory

The client commissioning the GMO test undertakes:

- To check the VLOG recognition of the commissioned laboratory regularly, at least once per calendar 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.*

### J 1.2 Sampling

The following minimum quantities of sample materials are drawn for GMO testing depending on the sample matrix:

- Feed: min. 400 g, max. 1 kg
- Raw materials (whole maize/corn kernels, soy beans or rapeseed/canola grains, among other): at least 3000 grains or approx. the respectively corresponding sample amount (maize/corn at least 1000 g; soy at least 700 g, rapeseed/canola at least 60 g)



*Explanation: The minimum quantities referred to relate to entire grains and/or beans. For raw materials that exhibit better homogeneity (e.g. soya protein concentrate), smaller weighed portions may be used in coordination with the responsible laboratory and the client.*

- Rice and rice products: at least 500 g
- Salmon filet: at least 5 g each from at least 10 animals
- Salmon products: at least 50 g

The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.



## Glossary: Definition of Terms

The following definitions and abbreviations are used for the terms utilised in this document:

**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.

**Calendar year:** Time period from 1 January until 31 December of a year. The VLOG Standard refers to the Gregorian calendar.

**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 (Chapter B 3.3 and B 7.1) and
- in particular, into a GMO monitoring system in accordance with Chapter B 7.2, 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, site or branch 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 on 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 business 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 businesses 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:** 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 4.2 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 businesses 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 Agriculture group:** A VLOG Agriculture Group is a combination of at least two agricultural businesses/sites (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture. Group certification is available for businesses with at least two sites as well as for the joint certification of multiple businesses with their sites.

**“VLOG geprüft” quality:** Quality of a feed that is certified in accordance with the VLOG Standard.

**“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 retail group:** A VLOG Retail Group is a combination of branch operations (the so-called group members) for the purpose of VLOG group certification in retail.

**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 businesses 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
- (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) Dealing with Deviations and breaches
- (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
- (23a) Members List
- (23b) Members Lists laying hens
- (23c) Transmission of Stable Spaces
- (23d) Evaluation/Overview Test Results
- (23e) Data Release Statement
- (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/](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.

VLOG Standard Annex 1	<b>GMO-Free Certificate</b> According to the VLOG "Ohne Gentechnik" Production and Certification Standard/EGGenTDurchfG <b>Food Ingredients, Processing Aids and Other Substances</b>	<b>Version: 01.09.20</b> <b>Obligatory as of:</b> 01.01.21
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**Producer/Supplier**

Name:	<input type="text"/>	Phone/Fax:	<input type="text"/>
Street address:	<input type="text"/>	Email:	<input type="text"/>
City and postal code:	<input type="text"/>	Country:	<input type="text"/>

**For the following product and all its ingredients:**

Product number supplier:	<input type="text"/>
Customer's product number:	<input type="text"/>
Exact product name:	<input type="text"/>
Status/version of the valid product specification*:	<input type="text"/>
Ingredients:	Last living organism(s)**
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

\* This certificate shall be deemed to form part of the specifications referred to above. The specification mentioned is available for the customer.

\*\* Please indicate the last living organism for all product ingredients that were used in the production process.

- (a) we certify that: The product and the food and food ingredients used to produce it contain no genetically modified organisms (GMOs); they do not consist of GMOs and are not produced from GMOs. Carryovers of GMOs are only tolerated if the GMO is approved in the EU and the detection limit of 0.1 % per ingredient is not exceeded. No GMOs were cultivated or released within 10 km of the beehives for apiary products. In the alternative, test results for the batch obtained according to VLOG requirements are available that show no genetic modification.
- (b) For ingredients of animal origin, we are in the possession of certificates in accordance with the VLOG Standard, the EU Regulation on Organic Production, or another standard recognised as equivalent.
- (c) No food, food ingredients, processing aids or other substances within the meaning of Sect. 3a (5) of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) (see Glossary) that are produced by GMOs have been used to prepare, treat, process or mix the food or food ingredients (depth of review: back to the last living organism in the production process). Processing aids and other substances within the meaning of § 3a (5) EGGenTDurchfG have not been used for the aforementioned purposes even if they or their components were labelled as consisting of GMOs, containing GMOs or produced from GMOs in accordance with Regulation (EC) No 1829/2003 or 1830/2003 or, if they had been placed on the market, would have had to be labelled.

<b>VLOG Standard Annex 1</b>	<b>GMO-Free Certificate</b> According to the VLOG “Ohne Gentechnik” Production and Certification Standard/EGGenTDurchfG <b>Food Ingredients, Processing Aids and Other Substances</b>	<b>Version: 01.09.20</b> <b>Obligatory as of:</b> 01.01.21
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We have suitable proof that requirements (a) to (c) were met for all components contained or used in the aforementioned product. Current declarations are on file. We have no evidence that raises doubts regarding compliance with the statutory requirements for the “Ohne Gentechnik” label. We agree to promptly send our customers/buyers and their certification body or licensing body a change notice or correction notice if this declaration is revoked or modified or if facts become known that raise doubts regarding compliance with statutory labelling requirements.

The certification or licensing body responsible for supervising the customer is authorised to verify the accuracy of this certification and to take samples for analytical evidence.

We assume liability for the accuracy of the statements in this declaration.

Name, Position

Place

Date

Signature

Company stamp

### Glossary

Term	Explanation
EGGenTDurchfG	German EC Genetic Engineering Implementation Act: German act on the implementation of European Community or European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes. The relevant requirements of §§ 3a and 3b of this Act for the ingredients and other substances used are shown in this certificate.
GMO - “genetically modified organism”	An organism, the genetic material of which has been modified in a way which is not naturally possible by cross-breeding and/or natural recombination, with the exception of organisms in which a genetic modification has been induced by the use of the processes listed in Annex 1B to Directive 2001/18/EC (Article 2(1)(5) of Regulation (EC) No 1829/2003).
“Produced from GMOs”	Wholly or partly derived from GMOs, but not consisting of or containing GMOs (Article 2(1)(10) of Regulation (EC) No 1829/2003).
“Produced by GMOs”	Derived by using a GMO as the last living organism in the production process, but not containing or consisting of GMOs nor produced from GMOs (Art. 2 letter v of Regulation (EC) No. 834/2007).
“Living organism”	Any biological unit capable of reproducing or transferring genetic material (Art. 2 No. 1 of Directive 2001/18/EC, e.g. maize/corn grain; potato). The ability to propagate can be lost, for example, through crushing, drying or heating (e.g. maize/corn starch; potato starch).
Processing aids	Any substance not consumed as a food ingredient by itself, intentionally used in the processing of raw materials, foods or their ingredients, to fulfil a certain technological purpose during treatment or processing and which may result in the unintentional but technically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the finished product (Art. 2 letter y of Regulation (EC) No. 834/2007).
“Other substances within the meaning of Sec. 3a (5) of the EGGenTDurchfG”	Substances within the meaning of § 5 para. 2 of the Food Labelling Ordinance (LMKV) as amended in Ordinance of 18th December 2007. This includes: <ul style="list-style-type: none"> <li>• Components of an ingredient that were temporarily removed during manufacturing and then added back into the food without exceeding their original quantity,</li> <li>• Additives, aromas, enzymes and microorganism cultures that were contained in one or more ingredient of a food, as long as they no longer have a technological effect in the final product,</li> <li>• Solutions and carrier substances for additives, aromas, enzymes and microorganism cultures, as long as they are used only in technologically necessary quantities</li> <li>• Extraction solvents and</li> <li>• Substances used in the same way and for the same purpose as processing aids and which are present in the finished product, even in an altered form.</li> </ul>
Standard recognised as equivalent	All standards recognized by VLOG as equivalent can be found here: <a href="#">Standards recognised as equivalent</a>

<b>VLOG Standard Annex 2</b>	<b>Certificate for “Ohne Gentechnik” Compliant Feeding of Animals</b>	<b>Version: 01.09.20 Obligatory as of: 01.01.21</b>
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Supplier

Name: Phone/Fax:

Street address: Email:

City and postal code: Country:

**We hereby confirm “Ohne Gentechnik” compliant feeding for the following animals/animal groups<sup>1</sup>:**

Ear tag number/stamp/other information uniquely identifying the animal/animal groups	“Ohne Gentechnik” compliant feeding since <sup>2</sup> :

For other animals see attachment<sup>3</sup>:

We have suitable proof that the requirements for “Ohne Gentechnik” compliant feeding were met for all the aforementioned animals/animal groups. We agree to promptly send our customers/buyers and their certification body or licensing body a change notice or correction notice if this declaration is revoked or modified or if facts become known that raise doubts regarding the accuracy of this certificate.

We hereby authorise the Verband Lebensmittel ohne Gentechnik (VLOG), to verify the accuracy of this confirmation in on-site inspections within the scope of random sampling or in suspicious cases and to take samples for testing. These inspections may be carried out by third parties on behalf of VLOG.

We assume liability for the accuracy of the statements in this declaration.

Name, Position

Place Date Signature Company stamp

<sup>1</sup> “Ohne Gentechnik” compliant feeding is understood to mean the exclusive use of feed that does not fall under the labelling obligation pursuant to EU Regulations (EC) Nos. 1829/2003 and 1830/2003. According to those regulations, feed may not be GMOs itself, contain components of GMO or have been produced from GMOs.

<sup>2</sup> Please indicate the date from which the animal continuously received “Ohne Gentechnik” compliant feed. In case of interruptions, the counting or the minimum feed conversion period must start over.

<sup>3</sup> Please indicate the name of the farm. In addition, please list in the attachment the date of certification, the animal and the date from which the “Ohne Gentechnik” compliant feeding started.

VLOG Standard Annex 3	Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)	Version: 01.09.20 Obligatory as of: 01.01.21
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## I. Business ID and animal information

Balis/VVVO No.:  Name:   
Street:  City and postal code:   
Phone:  Fax:  Delivery date:

No.	Type of animal/species	Ear tag	Date of birth	"Ohne Gentechnik" conversion date	VLOG-compliant*
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
5	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No

Total number of animals to be slaughtered:

\* To be classified as "VLOG-compliant" every animal must meet the requirements for "Ohne-Gentechnik" feeding for a prescribed time interval before slaughtering. This period is four months for pigs and twelve months for cattle, or, in any case, at least three-fourths of an animal's life. The following formula can be used to make the calculation for cattle:

$$\frac{\text{Number of days of Ohne Gentechnik feeding (conversion date to delivery date)}}{\text{Total number of days (date of birth until delivery date)}} \times 100 < 75\% \text{ compliant}$$

## Regulation on the Hygiene Requirements for the Manufacture, Treatment and Marketing of Certain Foodstuffs of Animal Origin (Animal Foodstuffs Hygiene Regulation - Tier-LMHV)

Annex 7 (to Sec. 10 para. 2) information on food safety in accordance with Appendix II Section III No. 1 in conjunction with Nos. 3 and 4 lit. b sentence 2 of Regulation (EC) No. 853/2004 for animals that were taken to or will be taken to a slaughterhouse.

## II. Standard Declaration

The food business operator who is responsible for the holding of origin for the aforementioned animals declares the following:

- There is no relevant information on the animal health status at the holding of origin, the health status of the animals and on production data, which may indicate the presence of a disease. The holding of origin is not aware of any relevant information regarding previous ante-mortem and post-mortem inspections of the slaughtered animals.

1a. Officially approved use of controlled livestock conditions in pig-farming facilities Yes No

- There are no signs of disease that could affect the safety of the meat.
- For seven days before the animals were brought for slaughter – and during the entire fattening period for broiler chickens – there were

☐ no waiting times for veterinary medicinal products administered

☐ waiting times for the following veterinary medicinal products

No other treatments were performed, except for (e.g. repellents).

- There are no sample test results that are of relevance to the protection of public health, except for:

- Name and address of regular veterinarian:

Place

Date

Farmer's Signature

VLOG Standard Annex 4	Sampling Log GMO Testing	Version: 01.09.20 Obligatory as of: 01.01.21
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Company (designation, company stamp, if applicable):

Send test results to (email):

Identification number (if applicable):

Sampling location, add sketch (if applicable):

Name of the sampler:

Type of sample: ☐ Seed ☐ Feed ☐ Raw material ☐ Product

VLOG certification: ☐ Yes ☐ No

Type/description:

Manufacturer:

production date (if known):

Lot number or internal number:

Best-before date (if available):

Composition\*, add attachments (if applicable):

\* For feed samples from on-farm mixers of feed the mixing protocol with the ingredients and the mixing date must be enclosed or specified. For purchased feed, seeds and raw materials attach the label, waybills and i.a. the specification.

Sample identification (specific numbers):

The containers shall be labelled with the sample ID, the sampling date and the facility number!

Sample container # 1:

Sample container # 2:

Sample container # 3 (remains in the company):

Place

Date

Signature of Business/Representative

Signature of Sampler/Auditor

<b>VLOG Standard Annex 5</b>	<b>Dealing with Positive Test Results (Feed)</b>	Version: 25.02.21 Obligatory as of: 25.02.21
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### **Evaluation of test results and measures to be taken**

For the security of the “Ohne Gentechnik” production it is important that samples collected not only be analysed quickly but that the test results be clearly evaluated and any (immediate and corrective) measures required be derived and implemented.

Positive GMO test results for feed are handled under the VLOG Standard in accordance with the following flow chart or the [Guidelines for Handling Mislabelled Feed in VLOG Production](#).

Second or third tests of the sampled batch are permitted, but must be performed immediately (express test). If two test results with different conclusions are obtained for a single sample, the following procedure is to be undertaken, resulting in a final finding:

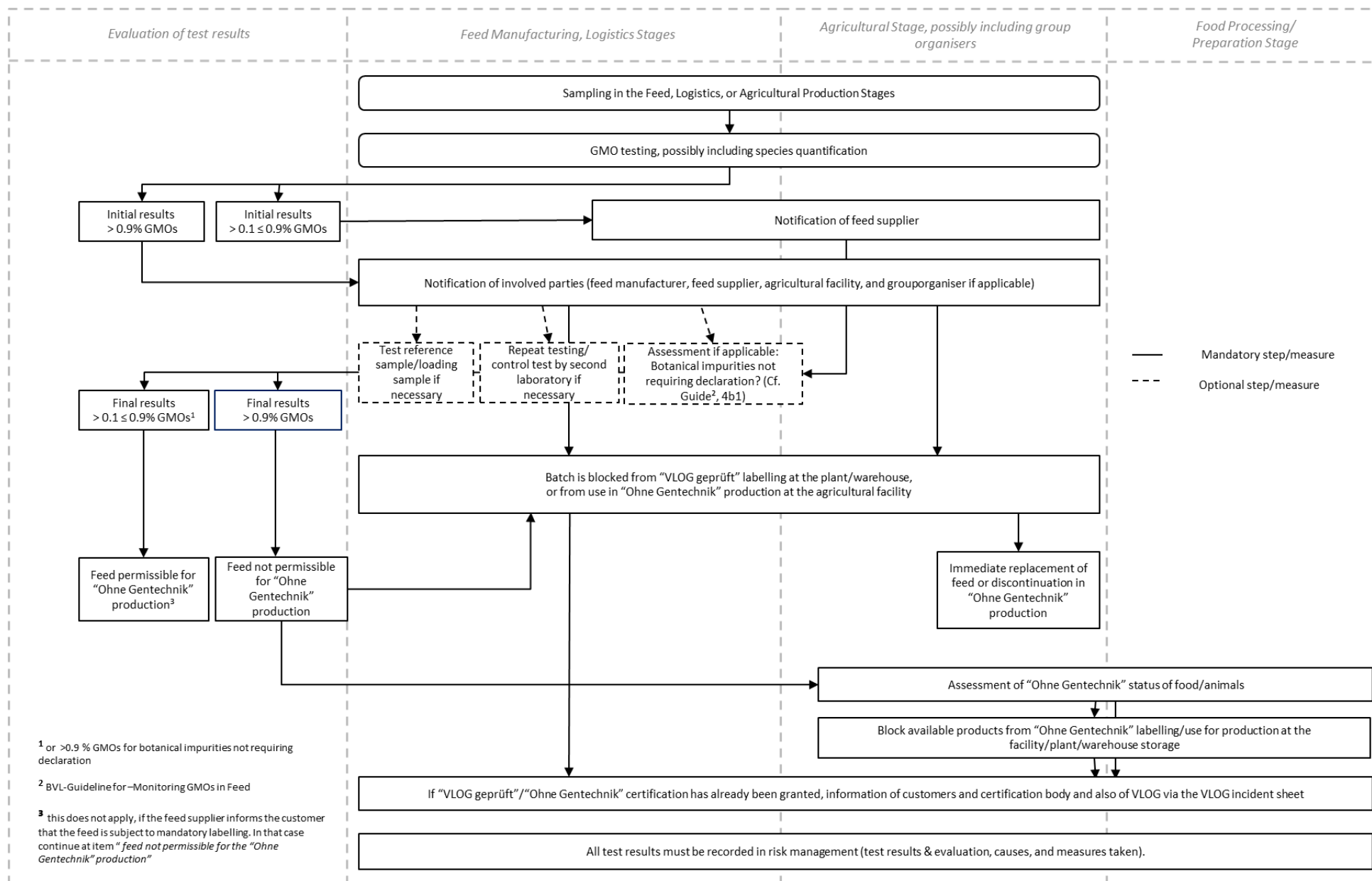
- If the results overlap, taking into account the expanded measurement uncertainty, the average value of the two test results is used.
- If the results do not overlap, taking into account the expanded measurement uncertainty, a third test of the batch is ordered.

The results of the test for GMO carryover in feed are shared with the relevant system partner for the given situation.

The feed supplier must determine whether other feed customers are affected by the incident, and inform them if this is the case.

In the event of an inaccurately labelled feed or food product placed on the market, the customers, the producer’s certification body and VLOG (using the stage-specific incident sheet) must be notified.

The internal audit and VLOG audit of the neutral certification body examine whether the test results were evaluated correctly, and whether any necessary (corrective) measures were properly implemented.

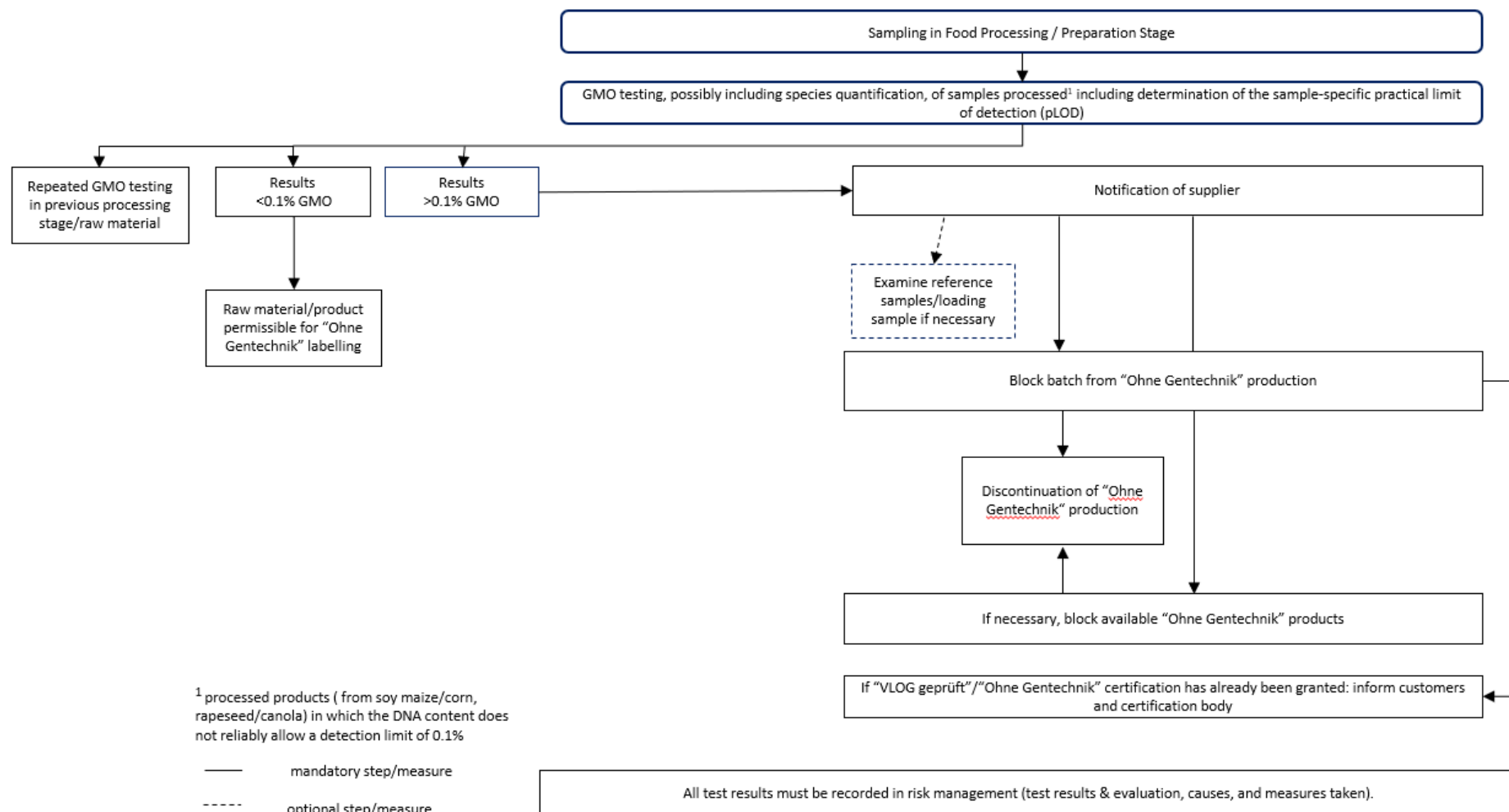




<b>VLOG Standard</b> <b>Annex 6</b>	<b>Dealing with Positive Test Results (Food)</b>	<b>Version:</b> 01.09.20 <b>Obligatory as of:</b> 01.01.21
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### Evaluation of test results and measures to be taken

For the credibility of “Ohne Gentechnik” production it is important that the samples collected not only be analysed quickly but that the test results be clearly evaluated and any (immediate and corrective) measures required be derived and implemented. Positive GMO test results for food are handled under the VLOG Standard in accordance with the following flow chart.



<b>VLOG Standard</b> <b>Annex 7</b>	<b>Reduction of the Scope of Testing after</b> <b>Switching Feed in Group Organisations</b>	<b>Version:</b> 01.09.20 <b>Obligatory as of:</b> 01.01.21
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Process diagram for reducing the scope of testing in group certification at the agricultural stage. This flow chart only provides an overview of the certification process. Details can be found in Chapter E 4.10.3.

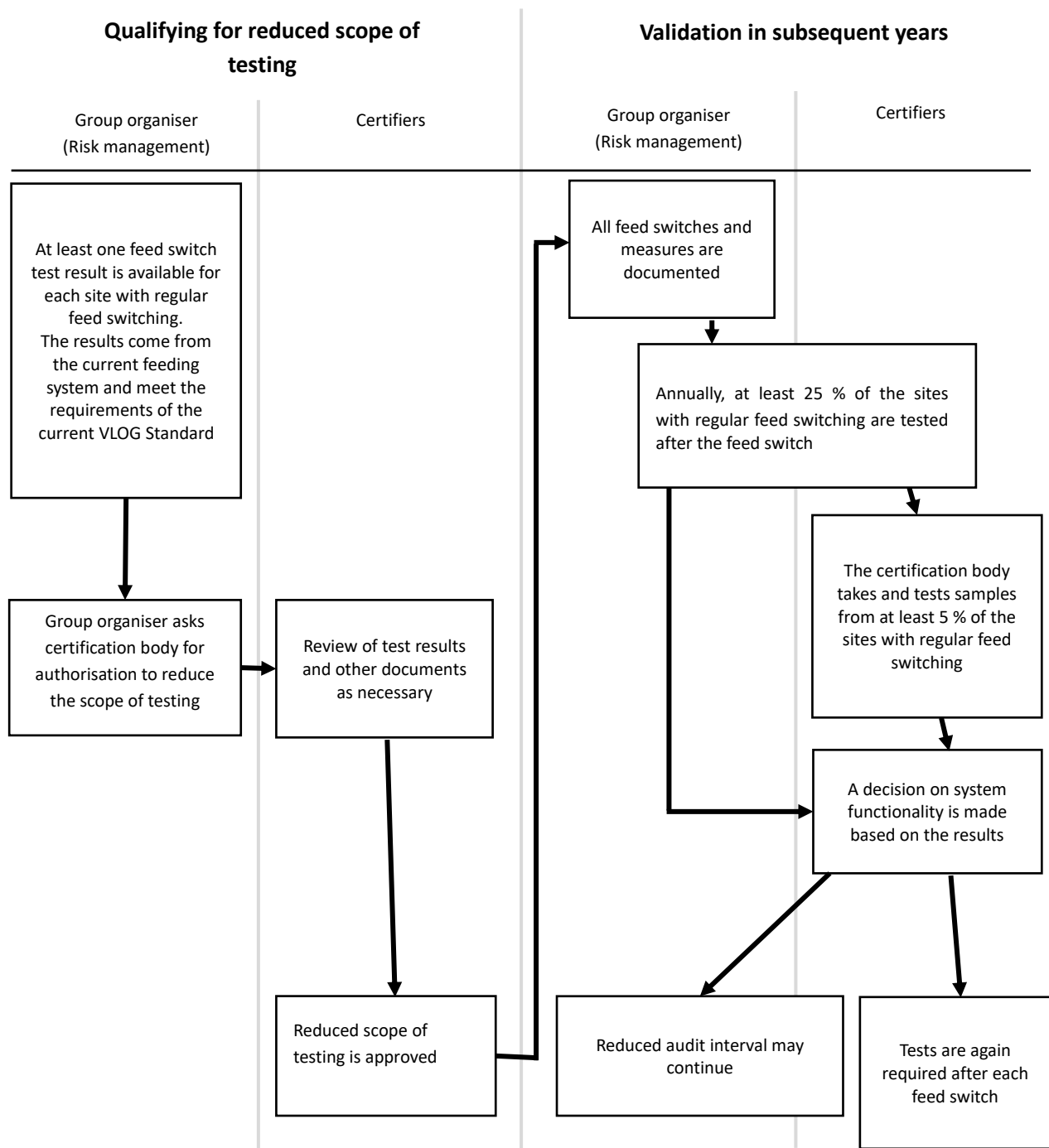
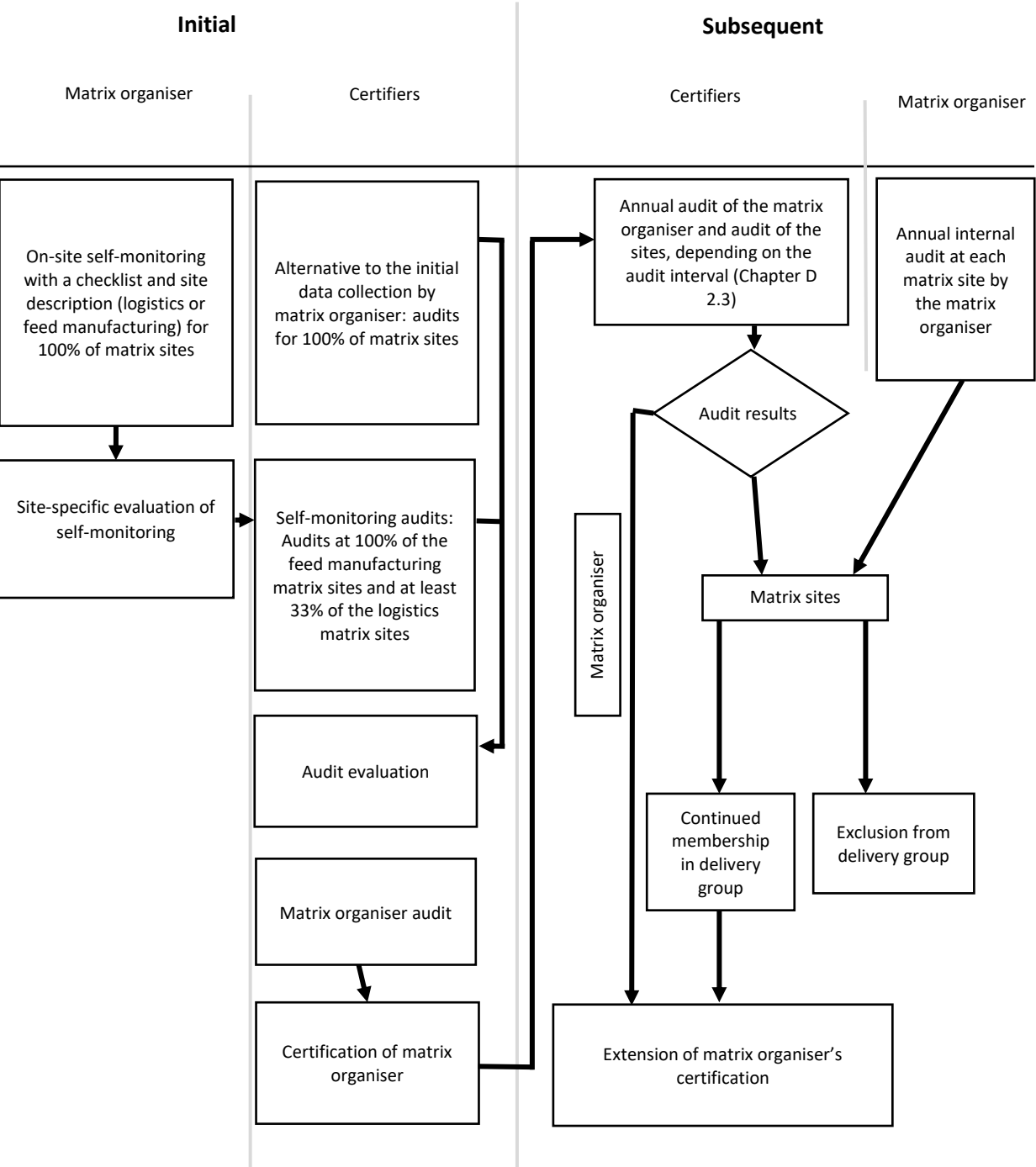




Diagram of the matrix certification process of matrix organisations with matrix sites affiliated by contract. This flow chart only provides an overview of the certification process. Details can be found in Part D.



<b>VLOG Standard Annex 10</b>	<b>Dealing with deviations and breaches</b>	<b>Version: 01.09.21 Obligatory as of: 01.01.22</b>
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<b>Events in operations that trigger sanctions</b>	<b>Sanction by certification body</b>
Minor deviation (B-evaluation, not fulfilled)	<ul style="list-style-type: none"> <li>• Written notification</li> </ul> <p>(not a sanction in the actual sense but a means to avoid future violations)</p>
Breach of documentation obligations that can endanger the safety of the system (possible evaluation: not fulfilled, risk)	<ul style="list-style-type: none"> <li>• Stricter registration and reporting obligation</li> <li>• Follow-up audit, if necessary</li> <li>• Additional sampling and testing, if necessary</li> <li>• Certificate issued only after implementation and verification of corrective action by the certification body</li> </ul>
Non-compliances or breaches that endanger “Ohne Gentechnik” food or “VLOG geprüft” feed, e. g. use of conventional raw materials, failure to comply with conversion periods, no segregation of batches, etc. (possible evaluation: not fulfilled, risk, KO)	<ul style="list-style-type: none"> <li>• Warning letter</li> <li>• Follow-up audit</li> <li>• Additional sampling and testing, if necessary</li> <li>• When evaluation reveals a risk: Certificate issued only after implementation and verification of corrective action by the certification body</li> <li>• When evaluation is KO: revocation of the VLOG certificate within 2 business days</li> </ul>
Detection of GMOs in a tangibly affected quantity / batch or lot (e. g. a lot in a feed processing plant, etc.)	<ul style="list-style-type: none"> <li>• Exclusion of non-compliant goods/products from the GMO-free claim</li> <li>• Follow-up audit</li> <li>• Additional sampling and testing, if necessary</li> </ul>
Repeated violation of VLOG Standard	<ul style="list-style-type: none"> <li>• Warning letter</li> <li>• Follow-up audit</li> <li>• Additional sampling and testing, if necessary</li> <li>• Suspension of certification with temporally limited marketing ban on “Ohne Gentechnik” foods or “VLOG geprüft” feeds</li> </ul>
<ul style="list-style-type: none"> <li>• Major violations;</li> <li>• Lack of willingness to comply with the guidelines;</li> <li>• Misuse of the VLOG certificate for noncertified products/feed or use in a misleading way;</li> <li>• Refusal of follow-up audit, or non-compliant follow-up audit (result) after suspension of certification</li> </ul>	<ul style="list-style-type: none"> <li>• Termination of the monitoring contract</li> <li>• Withdrawal of the VLOG certificate</li> </ul>

<b>VLOG Standard Annex 11</b>	<b>VLOG Certificate Template</b>	<b>Version: 01.09.21 Obligatory as of: 01.01.22</b>
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## CERTIFICATE

The certification body

**Sample Certification Body GmbH**

VLOG-Recognition No.: ZS-40XXXX

confirms, pursuant to a recognition agreement with VLOG e.V. and an audit performed on ##.##.####, documented in a report,

that the products/ feed and processes of

**Sample Company GmbH & CO. KG**

Official Registration No. (if available):

VLOG ID (10-xxxxx):

Sample Street 1, 10101 Sample City

Germany

at location: [####, if necessary, refer to Annex ####]

VLOG Sub-ID (if applicable, 10-xxxxx-A/-B etc.):

operating at the following stages: [Logistics, Feed Manufacturing, Matrix Certification, Agriculture, Agricultural Group Organisation, Food Processing/Preparation, Retail]

- the Sub-stage(s): [#### see Chapter A 2.1]

for the area of applicability of the audit: [#### see chapter A 3.4 and Annex 12, if necessary, with reference to Annex ####] meet the requirements of the VLOG “Ohne Gentechnik” Production and Certification Standard (Version 22.01, 01.09.2021), based on Sections 3a and 3b of the German EC Genetic Engineering Implementation Act (EGGenTDurchfG).

The VLOG certification entitles you – under the condition of a licence agreement with VLOG – to use the “Ohne GenTechnik”/or “VLOG geprüft” seal.



*Explanation: Which logo is used depends on the stage that is certified.*

Report No.: #####, if applicable

Certification No.: #####

Certification valid until. ##.##.20##

Date of certificate issued: ##.##.20##

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Place, Date Name/Certifier's Signature

<b>VLOG Version Annex 12</b>	<b>Areas of Application of VLOG Certification</b>	<b>Version: 04.11.21 Obligatory as of: 01.01.22</b>
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The following areas of application of VLOG certification is more closely defined pursuant to Chapters A 2.1 and A 3.4.:

Stage	Sub-stage	Areas of Applicability	
<b>Logistics</b>	Transport	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> </ul>	<ul style="list-style-type: none"> <li>• Food (bulk)</li> </ul>
	Storage	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> </ul>	<ul style="list-style-type: none"> <li>• Food (bulk)</li> </ul>
	Handling	<ul style="list-style-type: none"> <li>• Feed</li> <li>• Food</li> </ul>	
	Trade/ Drop shipping	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> <li>• Feed (packaged)</li> <li>• Food (bulk)</li> </ul>	<ul style="list-style-type: none"> <li>• Food (packaged)</li> <li>• Including conversion of single-component feed to “VLOG geprüft”</li> </ul>
	Private Labelling	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> <li>• Feed (packaged)</li> </ul>	
<b>Feed Manufacturing</b>	Feed manufacturing/ processing	<ul style="list-style-type: none"> <li>• Compound feed (including complete and supplementary feed)</li> <li>• Mineral feed</li> </ul>	<ul style="list-style-type: none"> <li>• Feed material</li> <li>• Lick blocks</li> <li>• Feed additives</li> <li>• Premixed Feed</li> </ul>
	Mobile grinding and mixing facility		
<b>Matrix Certification</b>	Transport	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> </ul>	<ul style="list-style-type: none"> <li>• Food (bulk)</li> </ul>
	Storage	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> </ul>	<ul style="list-style-type: none"> <li>• Food (bulk)</li> </ul>
	Handling	<ul style="list-style-type: none"> <li>• Feed</li> <li>• Food</li> </ul>	
	Trade/ Drop shipping	<ul style="list-style-type: none"> <li>• Feed (bulk)</li> <li>• Feed (packaged)</li> <li>• Food (bulk)</li> </ul>	<ul style="list-style-type: none"> <li>• Food (packaged)</li> </ul>

<b>VLOG Version Annex 12</b>	<b>Areas of Application of VLOG Certification</b>	<b>Version: 04.11.21 Obligatory as of: 01.01.22</b>
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Stage	Sub-stage	Areas of Applicability	
		<ul style="list-style-type: none"> <li>Including conversion of single-component feed to “VLOG geprüft”</li> </ul>	
	Private labelling	<ul style="list-style-type: none"> <li>Feed (bulk)</li> <li>Feed (packaged)</li> </ul>	
	Feed manufacturing/processing	<ul style="list-style-type: none"> <li>Compound feed (including complete and supplementary feed)</li> <li>Mineral feed</li> </ul>	<ul style="list-style-type: none"> <li>Feed material</li> <li>Lick blocks</li> <li>Feed additives</li> <li>Premixed Feed</li> </ul>
	Mobile grinding and mixing facilities		
<b>Agriculture</b>	Animal production	<ul style="list-style-type: none"> <li>Cattle – cow’s milk (raw)</li> <li>Cattle – dairy cows &amp; heifers/female calves (meat/animals)</li> <li>Cattle – fat stock</li> <li>Cattle – breeding bull</li> <li>Pig – breeding piglets/sow keeping</li> <li>Pig – fattening pigs</li> <li>Pig – breeding animals</li> <li>Poultry – laying hens (meat/animals)</li> <li>Poultry – eggs</li> <li>Poultry – broiler chickens (stating the type – turkeys / chickens / ducks / geese)</li> <li>Poultry – pullets</li> </ul>	<ul style="list-style-type: none"> <li>Poultry – day-old chicks (stating the type turkey/chicken)</li> <li>Sheep – meat/animals</li> <li>Sheep – sheep’s milk (raw)</li> <li>Goats – meat/animals</li> <li>Goats – goat’s milk (raw)</li> <li>Horses</li> <li>Rabbits</li> <li>Farmed game</li> <li>Aquaculture (stating the type)</li> <li>Apiary – honey/bees</li> <li>Camels</li> </ul>
	Animal transport, livestock trade		



<b>VLOG Version Annex 12</b>	<b>Areas of Application of VLOG Certification</b>	<b>Version: 04.11.21 Obligatory as of: 01.01.22</b>
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Stage	Sub-stage	Areas of Applicability	
<b>Agricultural Group Organisation</b>	Animal production	<ul style="list-style-type: none"> <li>• Cattle – cow’s milk (raw)</li> <li>• Cattle – dairy cows &amp; heifers/female calves (meat/animals)</li> <li>• Cattle – fat stock</li> <li>• Cattle – breeding bull</li> <li>• Pig – breeding piglets/sow keeping</li> <li>• Pig – fattening pigs</li> <li>• Pig – breeding animals</li> <li>• Poultry – laying hens (meat/animals)</li> <li>• Poultry – eggs</li> <li>• Poultry – broiler chickens (stating the type – turkeys / chickens / ducks / geese)</li> <li>• Poultry – pullets</li> </ul>	<ul style="list-style-type: none"> <li>• Poultry – day-old chicks (stating the type turkey/chicken)</li> <li>• Sheep – meat/animals</li> <li>• Sheep – sheep’s milk (raw)</li> <li>• Goats – meat/animals</li> <li>• Goats – goat’s milk (raw)</li> <li>• Horses</li> <li>• Rabbits</li> <li>• Farmed game</li> <li>• Aquaculture (stating the type)</li> <li>• Apiary – honey/bees</li> <li>• Camels</li> </ul>

<b>VLOG Version Annex 12</b>	<b>Areas of Application of VLOG Certification</b>	<b>Version: 04.11.21 Obligatory as of: 01.01.22</b>
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<b>Food Processing/ Preparation</b>	N.A.	<ul style="list-style-type: none"> <li>• Slaughtering (cattle)</li> <li>• Slaughtering (pigs)</li> <li>• Slaughtering (poultry)</li> <li>• Slaughtering (fish/ seafood stating the type)</li> <li>• cutting (cattle)</li> <li>• cutting (pigs)</li> <li>• cutting (poultry)</li> <li>• cutting (fish/ seafood stating the type)</li> <li>• Fish products</li> <li>• Meat – floury (stating the animal species)</li> <li>• Meat – spiced/marinated (stating the animal species)</li> <li>• Meat products (stating the product: firm/spreadable raw sausage, parboiled sausages, parboiled sausage, spreadable cooked sausage, black pudding, jellied brawn, pâté, liver sausage, cooked mettwurst, head cheese, cooked/raw salted meat, corned meat)</li> <li>• stock, broth, bouillon (stating the animal species)</li> <li>• stock, broth, bouillon (vegetable)</li> <li>• Dairy (whole milk, skimmed milk)</li> <li>• Dairy (raw milk)</li> <li>• Fermented milk products</li> <li>• Plain yoghurt</li> <li>• Yoghurt products</li> <li>• Kefir products</li> </ul>	<ul style="list-style-type: none"> <li>• Butter milk products</li> <li>• Cream and Cream products</li> <li>• Milk products with fruit preparations</li> <li>• Prepared milk beverages (flavoured milk drinks)</li> <li>• Pudding, cream dishes, desserts, sweet sauces</li> <li>• Butter, butterfat</li> <li>• Margarine</li> <li>• Milk substitute products</li> <li>• Hard cheese</li> <li>• Semi-hard cheese/sliced cheese</li> <li>• Semi-soft cheese</li> <li>• Sour milk cheese</li> <li>• Soft cheese</li> <li>• Cream cheese</li> <li>• Brine cheese</li> <li>• Pasta filata cheese</li> <li>• Processed cheese, processed cheese preparation</li> <li>• cheese preparations</li> <li>• Quark</li> <li>• Quark with herbs</li> <li>• Dry milk products (stating the product: powdered milk, yoghurt powdered, kefir powder, skim milk powder, buttermilk powder, whey powder)</li> </ul>
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<b>VLOG Version Annex 12</b>	<b>Areas of Application of VLOG Certification</b>	<b>Version: 04.11.21 Obligatory as of: 01.01.22</b>
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	<ul style="list-style-type: none"> <li>• Powder mixture for dairy product</li> <li>• Lactose</li> <li>• Milk protein</li> <li>• Milk permeate</li> <li>• Ice cream</li> <li>• Coffee cream</li> <li>• Unsweetened evaporated milk products</li> <li>• Sweetened condensed milk products</li> <li>• Whey and Whey products</li> <li>• Skim milk concentrate/whey concentrate</li> <li>• Meat substitute products</li> <li>• Vegetable spreads and dips</li> <li>• Eggs</li> <li>• Cooked, coloured eggs</li> <li>• Whole egg liquid, egg yolk liquid, egg white liquid</li> <li>• Whole egg powder, egg yolk powder, egg white powder</li> <li>• Sucrose (Sugar from sugar beet)</li> <li>• Sucrose (Sugar from sugar cane)</li> <li>• Liquid sugar</li> <li>• Invert sugar syrup</li> <li>• Glucose, Glucose syrup</li> <li>• Fructose and fructose syrup</li> <li>• Honey</li> <li>• Confectionery</li> </ul>	<ul style="list-style-type: none"> <li>• Fruit preparations</li> <li>• Fruit spread</li> <li>• Fruit juices</li> <li>• Cooled or frozen fruit (mixtures)</li> <li>• Cooled or frozen vegetables (mixtures)</li> <li>• Tinned fruit</li> <li>• Tinned vegetables</li> <li>• Legumes</li> <li>• Cooking fat (stating the type)</li> <li>• Cooking oil (stating the type)</li> <li>• Beer</li> <li>• Pasta</li> <li>• Grain and Grain products</li> <li>• Cookies</li> <li>• Spices, blend of spices, marinades</li> <li>• Stabiliser</li> <li>• Enzyme, enzyme preparations</li> <li>• Processing aids</li> <li>• Cut/shred (stating the product)</li> <li>• Grate (stating the product)</li> </ul>
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<b>VLOG Version Annex 12</b>	<b>Areas of Application of VLOG Certification</b>	<b>Version: 04.11.21 Obligatory as of: 01.01.22</b>
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<b>Retail</b>	N.A.	<ul style="list-style-type: none"> <li>• Bulk meat products</li> <li>• Bulk meat products spiced/marinated</li> <li>• Bulk cheese products</li> <li>• Bulk cheese product spiced/marinated</li> </ul>
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Other areas of applications ca be issued after consultation with VLOG

<b>VLOG Standard Annex 13</b>	<b>VLOG Facility Description Logistics Stage</b>	<b>Version 01.09.21</b>
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## PART 1: BUSINESS PARAMETERS

Please fill out all tables completely, and always check the answers that are applicable to your business.

<b>Name of business</b>	
Official approval or registration number (in accordance with Regulation EC No. 183/2005)	
Address/location of the business (including country code)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG-ID <sup>1</sup> or matrix organiser	

### Description of activities

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion (%) of the total production	Annual tonnage of outgoing goods
<input type="checkbox"/> Transport		
<input type="checkbox"/> Storage		
<input type="checkbox"/> Handling		
<input type="checkbox"/> (Drop) shipping <input type="checkbox"/> incl. conversion of single-component feed to "VLOG geprüft"		
<b>Of</b> <input type="checkbox"/> Feed <input type="checkbox"/> Food		

### Use of the "VLOG geprüft" and/or the "Ohne GenTechnik" seal

- ☐ The "VLOG geprüft" seal and/or the "Ohne GenTechnik" seal is used on the following documents/media to label VLOG-certified feed and/or food. A licence agreement with VLOG is on file:
- ☐ Labels, declarations   
☐ Delivery slips, invoices   
☐ Website   
☐ Other media (flyers, catalogues, etc.)

<sup>1</sup> 10-xxxxx cf. Standard Usage Agreement with VLOG

<b>VLOG Standard Annex 13</b>	<b>VLOG Facility Description Logistics Stage</b>	<b>Version 01.09.21</b>
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## PART 2: ORGANISATION OF “VLOG” PRODUCTION

### Other sites

- ☐ No other sites are included in the VLOG certification.
- ☐ The following sites are included in the VLOG certification:

Name of the business	Address	Activity/process

- ☐ For others, see informal attachment

### Subcontractors/contract processors

- ☐ No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- ☐ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/certified under a standard recognised as equivalent or included in the business' own VLOG certification)

- ☐ For others, see informal attachment

## PART 3: SAMPLING & GMO TESTING

- ☐ Sampling and testing are not required:
- ☐ Only storage, transport and/or transshipment
  - ☐ Trading: Only tamper-proof, packaged goods (e.g., feed as sacked goods, food in its final packaging, etc.).
  - ☐ Trading of raw materials/products: Only VLOG-certified or certified under another standard recognised as equivalent.
- ☐ Requirement of sampling (reference samples) and testing of feed and/or food in “Ohne Gentechnik” production. The business has a written sampling and testing plan:
- ☐ Trading of “VLOG geprüft” feed
  - ☐ Conversion of feed to “VLOG geprüft” quality
  - ☐ Private labelling of feed
  - ☐ Trading of VLOG food

<b>VLOG Standard Annex 13</b>	<b>VLOG Facility Description Logistics Stage</b>	<b>Version 01.09.21</b>
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#### PART 4: DOCUMENTS TO BE PREPARED

The following information must be provided to the certification body/auditor, or must be examined during the audit:

- List of all stored, transported, transferred, and traded raw materials, food and feed of the “VLOG” and “VLOG-geprüft” section. The list must include, at a minimum, the following information:
  - Exact description of the raw material, food or feed
  - Record of available GMO documentation (e.g. VLOG non-GMO certification, specification, delivery slip)
- List of all suppliers of “VLOG” products and “VLOG-geprüft” feed (products with the “Ohne Gentechnik” seal or feed with “VLOG-geprüft” seal)

#### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date.  
I/we hereby declare the correctness of the information provided above.

Year of examination	202[...]	202[...]	202[...]
Name			
Function			
Date			
Signature			

**VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for Logistics Stage**
**V22.01**

Date of audit \_\_\_\_\_

Duration of audit (time from - to): \_\_\_\_\_

Auditor: \_\_\_\_\_

Combination with other standard(s): \_\_\_\_\_

Responsible certification body: \_\_\_\_\_

VLOG-ID (10-xxxxx) or Matrix organiser: \_\_\_\_\_

Business: \_\_\_\_\_

Identification number if available: \_\_\_\_\_

Sites that have been audited (incl. adress): \_\_\_\_\_

 Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal? ☐ yes ☐ no

 Is there a Licence Agreement with VLOG in place? ☐ yes ☐ no

 Sampling during audit: ☐ yes ☐ no

Focus of facility inspection: \_\_\_\_\_

Scope of certification: \_\_\_\_\_

Auditor's signature: \_\_\_\_\_

Business's signature: \_\_\_\_\_

No. in Standard	Topic in Standard	Grading (please select with " x ")							Corrective actions	
		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
<b>B 3</b>	<b>General Requirements for the Logistics Stage</b>									
B3.1	Facility Description									
B3.2	Assignment of Responsibilities / Organisational Chart									



No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
B3.3	Risk Management	KO									
B3.4	Commissioning External Service Providers										
B3.5	Segregation of Goods Flows/Exclusion of Commingling	KO									
B3.6	Handling of Non-Compliant Feed, Raw Materials and Products	KO									
B3.7	Outgoing Goods Control/Labelling on Bills of Lading										
B3.8	Traceability	KO									
B3.9	Complaint Management										
B3.10	Goods Recall										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
B3.11	Crisis Management	KO									
B3.12	Corrective Action/Ongoing Improvement Process										
B3.13	Documentation and Retention Period										
B3.14	Staff Training										
B3.15	Internal Audits										
B4	Specific Requirements for Storage and Handling	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
B4.1	Incoming Goods Inspection	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
B5	Specific Requirements for Trade	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
B5.1	Incoming Goods Inspection	KO									
B5.2/ B5.2.1	Sampling and Testing Sampling- and testing plan										
B5.2/ B5.2.2	Sampling and Testing Sampling- and testing frequency										
B5.2/ B5.2.3	Sampling and Testing Handling of positive test results										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
B6	Specific Requirements for Drop Shipping	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
B6.1	Incoming Goods Inspection	KO									
B7	Specific Requirements for Conversion of Feed to "VLOG geprüft"	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
B7.1	Specific Requirements for Risk Management										
B7.2	Sampling and Testing for Conversion										
B8	Specific Requirements for Private Labelling	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
B8.1	Certification Status of Contract Manufacturers	KO									
B8.2	Contractual Agreement between Private Labeller and Contract Manufacturer	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points		-15% of total points	not passed			
B8.3	Incoming Goods Inspection										
B8.4	Sampling and Testing (according B.5.2)										

#### Grading

Number of A criteria	0	
Number of B criteria	0	
Number of C criteria	0	
Number of N/A criteria	0	
Number of Knock Outs	0	
Number of risks	0	
Total points	0,00	
Maximum achievable number of points	270,00	
Number of evaluated criteria	0	
Achieved percentage	missing or incorrect entries!	not passed

<b>VLOG Standard Annex 15</b>	<b>VLOG Facility Description Feed Manufacturing Stage</b>	<b>Version 01.09.21</b>
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## PART 1: BUSINESS PARAMETERS


Please fill out all tables completely, and always check the answers that are applicable to your business. A separate VLOG facility description is available for VLOG-certified operators of mobile grinding and mixing facilities (VLOG Standard Annex 17).

<b>Name of business</b>	
<b>Official approval or registration number</b> (in accordance with Regulation EC No. 183/2005)	
<b>Address/location of the business</b> (including country code)	
<b>Contact person &amp; contact data</b> (e.g., telephone, e-mail address)	
<b>VLOG ID<sup>1</sup> or matrix organiser</b>	

### Description of activities

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion (%) of the total production	Annual tonnage of outgoing goods
<input type="checkbox"/> Feed material		
<input type="checkbox"/> Compound feed		
<input type="checkbox"/> Mineral feed		
<input type="checkbox"/> Lick blocks		
<input type="checkbox"/> Feed additives		
<input type="checkbox"/> Premixed feed		

- ☐ The business performs activities in the VLOG stage of Logistics (transport, handling, storage, trading, drop shipping, private labelling of feed) that are subject to certification. The VLOG facility description for the stage of Logistics (VLOG Standard Annex 13) is attached.

 Facility description:  
Logistics

### Use of the "VLOG geprüft" seal

- ☐ The "VLOG geprüft" seal is used on the following documents/media to label VLOG-certified feed. A licence agreement with VLOG is on file:
- ☐ Labels, declarations
 ☐ Delivery slips, invoices
 ☐ Website
 ☐ Other media (flyers, catalogues, etc.)

<sup>1</sup> 10-xxxxx cf. Standard Usage Agreement with VLOG

<b>VLOG Standard Annex 15</b>	<b>VLOG Facility Description Feed Manufacturing Stage</b>	<b>Version 01.09.21</b>
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## PART 2: ORGANISATION OF “VLOG GEPRÜFT” PRODUCTION

### Other sites

- ☐ No other sites are included in the “VLOG geprüft” production.
- ☐ The following sites are included in the “VLOG geprüft” production and certification:

Name of the business	Address	Activity/process

☐ For others, see informal attachment

### Subcontractors/contract processors

- ☐ No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- ☐ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/certified under a standard recognised as equivalent or included in the business’ own VLOG certification)

☐ For others, see informal attachment

### Feed subject to compulsory labelling in the business/at the site

- ☐ Feed, technical processing aids, or other production means subject to compulsory labelling are not present in the business/at the site.
- ☐ The business/site has converted fully to “VLOG geprüft” production.
- ☐ The business/site processes or prepares feed not subject to compulsory labelling in addition to “VLOG geprüft” feed.
- ☐ Feed, technical processing aids, or other production means subject to compulsory labelling are present in the business/at the site.
- The separation between “VLOG geprüft” production and GMO production is organised as follows:
- ☐ Temporal segregation    ☐ Spatial segregation

<b>VLOG Standard Annex 15</b>	<b>VLOG Facility Description Feed Manufacturing Stage</b>	<b>Version 01.09.21</b>
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### PART 3: SAMPLING & GMO TESTING

GMO testing is necessary to protect “VLOG geprüft” production. The business has a written sampling and testing plan.

- ☐ Risk-prone feed at goods receiving
- ☐ GMO monitoring of outgoing goods

### PART 4: DOCUMENTS TO BE PREPARED

The following information must be provided to the certification body/auditor, or must be examined during the audit:

- List of all feed, auxiliary substances, and other production means used in “VLOG geprüft” feed. The list must include, at a minimum, the exact description of the feed, auxiliary substances, and/or other production means.
- Product list of “VLOG geprüft” feed types (including B2B feeds)

### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. We hereby declare the correctness of the information provided above.

Year of examination	202... <input type="text"/>	202... <input type="text"/>	202... <input type="text"/>
Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
Function	<input type="text"/>	<input type="text"/>	<input type="text"/>
Date	<input type="text"/>	<input type="text"/>	<input type="text"/>
Signature	<input type="text"/>	<input type="text"/>	<input type="text"/>



VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for Feed Manufacturing Stage

V22.01

Date of audit

Auditor:

Responsible certification body:

Business:

Sites that have been audited (incl. adress):

Sampling during audit:

Auditor's signature:

Duration of audit (time from - to):

Combination with other standard(s):

VLOG-ID (10-xxxxx) or Matrix Organiser:

Identification number if available:

Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal?

Is there a Licence Agreement with VLOG in place?

Dual production or production of feed that is not subjected to compulsory labelling?

Focus of facility inspection:

Scope of certification:

Business's signature:

☐ yes ☐ no

☐ yes ☐ no

☐ dual ☐ feed not subjected to compulsory labelling

No. in Standard	Topic in Standard	Grading (please select with " x ")							Corrective actions	
		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
C 3	General Requirements for Feed Manufacturing Stage									
C3.1	Facility Description									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
C3.2	Assignment of Responsibilities/Organisational Chart										
C3.3	Risk Management	KO									
C3.4	Commissioning External Service Providers										
C3.5	Incoming Goods Inspection										
C3.6	Segregation of Goods Flows/Exclusion of Commingling	KO									
C3.7	Handling of Non-Compliant Feed	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
C3.8	Traceability	KO									
C3.9	Complaint Management										
C3.10	Goods Recall										
C3.11	Crisis Management	KO									
C3.12	Corrective Action/Ongoing Improvement Process										
C3.13	Documentation and Retention Period										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
C3.14	Staff Training										
C3.15	Internal Audits										
C 4	Specific Requirements for Feed Manufacturing/Processing	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
C4.1	Reference Samples										
C4.2/ C.4.2.1	Sampling and Testing Sampling and testing plan										
C4.2/ C.4.2.2	Sampling and Testing Sampling and testing frequency										
C4.2/ C.4.2.3	Sampling and Testing Handling of positive test results										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
C4.3	Outgoing Goods Control/Labelling on Bills of Lading										
C 6	Specific Requirements for Mobile Grinding and/or Mixing Facilities	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A..									
C6.1	Specific Measures to Rule out Technically Avoidable Commingling										
C6.2	Safeguarding with a Carryover Test										
C6.3	Mixing Documentation and Mixing Protocols										
C6.4./C6.4.1	Sampling/Sampling Permission										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
C6.5	Transportation of Feed or Trading of Feed										
C6.6	Identification on Bills of Lading										

#### Grading

Number of A criteria	0	
Number of B criteria	0	
Number of C criteria	0	
Number of N/A criteria	0	
Number of Knock Outs	0	
Number of risks	0	
Total points	0,00	
Maximum achievable number of points	260,00	
Number of evaluated criteria	0	
Achieved percentage	missing or incorrect entries!	not passed

<b>VLOG Standard Annex 17</b>	<b>VLOG Facility Description Feed Stage - Mobile Grinding and Mixing Facilities</b>	<b>Version 01.09.21</b>
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## PART 1: BUSINESS PARAMETERS

Please fill out all tables completely, and always check the answers that are applicable to your business.

<b>Name of business</b>	
Address of the business (including country code)	
Official registration number, if applicable (in accordance with Regulation EC No. 183/2005)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG ID <sup>1</sup> or matrix organiser	

### Description of activities

Activity area in the VLOG production	Portion (%) of the total production	Annual tonnage
Mobile grinding and/or mixing facility		
<input type="checkbox"/> Trading of oils and fats <div style="margin-left: 20px;"> <input type="checkbox"/> Oils and fats of "VLOG geprüft" quality  <input type="checkbox"/> Oils and fats not subject to compulsory labelling  <input type="checkbox"/> Oils and fats subject to compulsory labelling         </div>		

<sup>1</sup> (10-xxxxx cf. Standard Usage Agreement with VLOG)

<b>VLOG Standard Annex 17</b>	<b>VLOG Facility Description Feed Stage - Mobile Grinding and Mixing Facilities</b>	<b>Version 01.09.21</b>
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**PART 2: ORGANISATION OF VLOG MIXTURES**

**Mobile grinding and/or mixing facilities involved in VLOG production**

Vehicle ID number	Official license plate	Last review by the auditor	Processing of		Measures established for dual use		Date of last carryover test
			exclusively feed not subject to compulsory labelling	feed subject to compulsory labelling	System purge, including minimum quantity (in kg)	Complete discharge	
			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	



<b>VLOG Standard Annex 17</b>	<b>VLOG Facility Description Feed Stage - Mobile Grinding and Mixing Facilities</b>	<b>Version 01.09.21</b>
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### PART 3: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date.  
I/we hereby declare the correctness of the information provided above:

Year of examination	202[ ]	202[ ]	202[ ]
Name			
Function			
Date			
Signature			

<b>VLOG Standard Annex 18</b>	<b>Template for Matrix Description including Site List</b>	<b>Version: 01.09.2021</b>
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The following document is a sample template for a matrix description. A matrix description must be submitted to the certification body at the time of the application. The matrix organiser must notify the certification body of major changes pertaining to VLOG certification.

## Matrix description of “SaMa GmbH” sample matrix

### Matrix organiser:

*SaMa GmbH*

*Sample street 12, 54321 Sample town*

### Responsible for matrix certification:

*Sam Sample (QM Officer of Sample GmbH)*

Telephone: 0123 4567 89

Email: s.sample@samagmbh.com

### Activities of matrix members:

*Sample text: The members of the SaMa VLOG matrix are businesses engaged in transportation, storage and feed manufacturing in accordance with the VLOG Standard [...].*

*The sites are mainly located in the administrative districts/federal states/countries of [...].*

*In part, the sites are engaged in other activities such as cattle and pig fattening or egg production [...]; however, these activities are not part of the SaMa VLOG matrix.*

### Contractors, subcontractors and outsourced processes:

*The following contractors are included in the SaMa matrix:*

- *Feedmill GmbH, Feedstreet 8, 12345 Sampleville*

*Contact person:*

*Contact information:*

*On behalf of SaMa GmbH [...]*

- *[...]*

### Responsibilities of the matrix organiser:

*Sample text: SaMa prepares and monitors the matrix's sampling and test plan [...] It arranges for sampling within the scope of the VLOG audit by a certification body [...]*

*SaMa arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective measures together with the affected companies [...].*

*SaMa is responsible for risk management and has instituted a crisis management system that involves the matrix members [...].*

*SaMa GmbH carries out an internal audit of the sites annually.*

<b>VLOG Standard Annex 18</b>	<b>Template for Matrix Description including Site List</b>	<b>Version: 01.09.2021</b>
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[...]

**Basis for the initial and subsequent certifications**

*Sample text: The matrix operates according to the 33% method: the matrix organiser audits 100% of the sites; after that the certification body audits at least 33% of the sites. In the following years, the audits by the certification body depend on the scope of applicability.*

*Or:*

*The matrix operates according to the 100% method: 100% of the sites are audited by the certification body before they can be added to the matrix. In the following years, the audits by the certification body depend on the scope of applicability.*

<b>VLOG Standard Annex 18</b>	<b>Template for Matrix Description including Site List</b>	<b>Version: 01.09.2021</b>
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Below is a template for a list of sites for matrix certification in logistics and feed production. The matrix organiser must always keep the list of sites up to date. The matrix organiser must promptly notify the certification body of any relevant changes. The following site list or a site list with equivalent content may be used.

*[Information in boldface is mandatory according to the Standard; the remainder is recommended.]*

#### Site list of SaMa GmbH

<b>Name/ Site</b>	<b>Business</b>	<b>Address</b>	<b>Scope of applicability for VLOG certification</b>	Matrix site since	Initial sampling by the matrix organiser (for 33% method)	<b>Most recent routine audit/initial audit by the certification body</b>
<i>Feedmill Sample town site</i>	<i>Sample GmbH</i>	<i>Sample street 2, 87654 Sample town</i>	<i>Feed production</i>	<i>[Date]</i>	<i>[Date]</i>	<i>[Date]</i>
<i>Transpofix Sampleville site</i>	<i>Transpofix GmbH</i>	<i>Sample street 1, 54321 Sampleville</i>	<i>Transport, storage</i>	<i>[Date]</i>	<i>[Date]</i>	<i>Has not yet taken place</i>
<i>[...]</i>						

**VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for the Matrix Organisation Stage**
**V22.01**

Date of audit: \_\_\_\_\_

Duration of audit (time from - to): \_\_\_\_\_

Auditor: \_\_\_\_\_

Combination with other standard(s): \_\_\_\_\_

Responsible certification body:: \_\_\_\_\_

VLOG-ID (10-xxxxx): \_\_\_\_\_

Business: \_\_\_\_\_

Identification number if available: \_\_\_\_\_

Sites that have been audited (incl. adress): \_\_\_\_\_

 Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal? ☐ yes ☐ no

 Is there a Licence Agreement with VLOG in place? ☐ yes ☐ no

 Sampling during audit: ☐ yes ☐ no

Scope of certification: \_\_\_\_\_

Auditor's signature: \_\_\_\_\_

Business's signature: \_\_\_\_\_

No. in Standard	Topic in Standard		Grading (please select with " x ")							Corrective actions	
			A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
<b>D 3</b>	<b>General Requirements for the Matrix Organiser</b>										
D3.1	Matrix Description, Site List, Facility Description										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
D3.2	Contractual Binding of the Group Members	KO									
D3.3	Risk Management	KO									
D3.4	Commissioning of external service providers										
D3.5	Implementation of the Requirements for Sampling and Testing										
D3.6	Staff and Member Training by the Matrix Organiser										
D3.7	Handling of Non-compliant Feed, Raw Materials and Products	KO									
D3.8	Complaint Management										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
D3.9	Goods Recall										
D3.10	Crisis Management	KO									
D3.11	Corrective Action/Continuous Improvement Process										
D3.12	Documentation and Retention Periods										
D3.13	Internal Audit										

#### Grading

Number of A criteria  
 Number of B criteria  
 Number of C criteria  
 Number of N.A. criteria  
 Number of Knock Outs  
 Number of risks  
 Total points  
 Maximum achievable number of points  
 Number of evaluated criteria  
 Achieved percentage

0	
0	
0	
0	
0	
0	
0,00	
130,00	
0	
missing or incorrect entries!	not passed

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Stage – Animal Production</b>	<b>Version 01.09.21</b>
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## PART 1: BUSINESS PARAMETERS

Please fill out all tables completely, and always check the answers that are applicable to your business. A separate facility description (Annex 20b) is available for beekeepers.

<b>Name of business</b>		
Facility number/VVVO no.		
Address of the business/site (including country code)		
Contact person & contact data (e.g., telephone, e-mail address)		
Type of VLOG certification/ VLOG-ID	<input type="checkbox"/> Individual VLOG certification	<input type="checkbox"/> Group member
	VLOG-ID: <div></div>	VLOG group member-ID: (Ask your group organiser) <div></div>

### Organizational chart

- ☐ There is an updated organisational chart for the agricultural business.
- ☐ For small facilities (according to the VLOG Standard):  
The following employees are involved in “Ohne Gentechnik” production:

Employees (Family members/external employees)	Function, responsibility	Substitution

### Description of activities

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion (%) of the total production	Volume produced annually (kg, t or units)	Starting date for “Ohne Gentechnik” feeding

- ☐ For others, see informal attachment




<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Stage – Animal Production</b>	<b>Version 01.09.21</b>
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## PART 2: ANIMAL INVENTORY, PURCHASE AND OUTSOURCING OF ANIMALS


### Stable space overview and animal inventory overview

- ☐ A current “VLOG stable space overview” is enclosed as an attachment.
- ☐ The business has a current animal inventory overview.

 Attachment:  
Stable space


### Purchase of animals for “Ohne Gentechnik” production

- ☐ No animals have been purchased since the last VLOG audit.
- ☐ Animals have been purchased since the last VLOG audit.
- ☐ “Ohne Gentechnik”-compliant feeding by the previous owner is being credited: The attachment “Purchase and outsourcing of animals” is enclosed
- ☐ The minimum feeding conversion period was begun after the purchase of the animal for the business or “Ohne Gentechnik”-compliant feeding by the previous owner is not being credited.
- ☐ Poultry for meat production: One-day chicks were purchased since the last VLOG audit.<sup>1</sup>

 Attachment:  
Purchase and  
outsourcing of  
animals

### Outsourcing of animals in “Ohne Gentechnik” production


- ☐ No animals have been outsourced since the last VLOG audit
- ☐ Animals have been outsourced since the last VLOG audit (e.g., cattle: young cattle, gestating cows):  
The attachment “Purchase and outsourcing of animals” is enclosed.

 Attachment:  
Purchase and  
outsourcing of  
animals

## PART 3: RATIONS & FEED


### Own feed production

- ☐ The business does not produce plant-based feed.
- ☐ The business itself produces plant-based feed. There is evidence that GMO cultivation is not permitted in the country of cultivation.  
None of the receipts for, or labels on, seeds or seedlings used in feed production indicate the presence of GMO in the seeds or seedlings.
- ☐ Staple/green feed ☐ Threshing crops
- ☐ Root crops ☐ Other:
- ☐ There is GMO cultivation in the country of cultivation (e.g., Spain, Portugal). The business itself produces plant-based feed. The attachment “GMO cultivation” is enclosed.

 Attachment:  
GMO cultivation

### Purchase of feed



- ☐ No feed has been purchased since the last VLOG audit
- ☐ Feed has been purchased since the last VLOG audit: The attachment “Purchase of feed” is enclosed.

 Attachment:  
Purchase of feed

<sup>1</sup> The minimum feeding conversion period begins on the date of receipt into “Ohne Gentechnik” production (e.g., broilers) or conversion to “Ohne Gentechnik” feeding (e.g., turkeys). Animals that were slaughtered at least 10 weeks after stabling or feed conversion can be marketed as “Ohne Gentechnik” or “VLOG”.

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Stage – Animal Production</b>	<b>Version 01.09.21</b>
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#### PART 4: RISK ANALYSIS & RISK MANAGEMENT

- ☐ The entire business operates in accordance with the requirements for “Ohne Gentechnik” production, i.e.:
- No GMO feed is produced, stored, processed or fed to animals.
  - There is no inter-business use of machinery or outsourcing of activities to external service providers when dealing with feed (except for cultivation and harvesting)<sup>2</sup>.
- Currently there are no further measures the business needs to take to preclude future contamination with or carryover of GMO-containing feed.
- ☐ There are risks in the business affecting “Ohne Gentechnik” production (e.g., GMOs in the business, inter-business use of machinery for feed after harvesting, mobile grinding and mixing facilities, other external service providers).
- The attachment “Risk analysis” or, for countries with GMO cultivation, the attachment “GMO cultivation” is enclosed.
-  Attachment: Risk analysis
-  Attachment: GMO cultivation

#### PART 5: SAMPLING & GMO TESTING

- ☐ Potentially risk-prone feed is only used in “Ohne Gentechnik” production if it is of “VLOG geprüft” quality or a quality recognised as equivalent. Sampling and testing are not necessary under the VLOG Standard.
- (If the item applies, continue to Part 6)*
- ☐ Only for VLOG group members:  
The agricultural business samples the risk-prone feed and retains any reference samples. The group organiser organises and commissions the GMO testing of the feed or the reference samples.
- (If the item applies, continue to Part 6)*
- ☐ According to the VLOG Standard, the business must take samples (reference samples) and test the feed used in “Ohne Gentechnik” production for GMOs because:
- ☐ Risk-prone feed is being used and/or
  - ☐ There is a regular switch between “Ohne Gentechnik” feeding and GMO-feeding in a VLOG operating unit and/or
  - ☐ The business uses a non-VLOG-certified mobile grinding and mixing facility.
- The business has a written sampling and testing plan.

<sup>2</sup> For example: Transport, drying, storage/relocation, crushing/grinding, mixing

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Stage – Animal Production</b>	<b>Version 01.09.21</b>
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#### PART 6: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

Attachments also applicable to the facility description:

- ☐ Attachment Stable space overview (mandatory attachment)
- ☐ Attachment Purchase and outsourcing of animals
- ☐ Attachment GMO cultivation
- ☐ Attachment Purchase of feed
- ☐ Attachment Risk analysis

The business itself checks the facility description once each calendar year, and it is up-to-date.  
I/we hereby declare the correctness of the information provided above.

Year of examination	202 <input type="text"/>	202 <input type="text"/>	202 <input type="text"/>
Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
Function	<input type="text"/>	<input type="text"/>	<input type="text"/>
Risk category (grading by the group organiser or prior certification)	<input type="text"/>	<input type="text"/>	<input type="text"/>
Date	<input type="text"/>	<input type="text"/>	<input type="text"/>
Signature	<input type="text"/>	<input type="text"/>	<input type="text"/>

VLOG Standard Annex 20	VLOG Facility Description Agriculture Attachment Stable space overview	Version: 01.09.21
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Name of business		VLOG-ID or VLOG group member-ID	
------------------	--	---------------------------------	--

Please indicate ALL livestock raised in your agricultural operation.

Animal species/animal category	Production/feeding			Stable spaces <i>For poultry for fattening: production volume (kg/year)</i>	Unique stable designation, site/VVVO No./ print number, if any	Remarks (indicate GMO feed, other)
	„Ohne Gentechnik“	Conventional - GMO-free	Conventional - with GMO			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Other: <input type="text"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment Purchase and outsourcing of animals</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>	
<b>VLOG-ID or VLOG group member-ID</b>	

#### **PURCHASE OF ANIMALS FOR THE OHNE GENTECHNIK PRODUCTION**

Animal category	Number of animals purchased since last VLOG audit	Previous owner (business + address)	Previous owner VLOG- certified/certified under equivalent standard
Select an item			<input type="checkbox"/>
Select an item			<input type="checkbox"/>
Select an item			<input type="checkbox"/>
Select an item			<input type="checkbox"/>

The following requirements apply if the animals were not purchased from a VLOG-certified business or a business recognised as certified under an equivalent standard:

- ☐ "Ohne Gentechnik" feeding by the previous owner can be credited toward the minimum feeding conversion period for **young cattle and/or milk cows in first lactation** only under the following conditions:
- Proof according to the VLOG Standard Annex 2

#### **Pigs**

- ☐ The piglets come from a VLOG-registered piglet producer. "Ohne Gentechnik" feeding by the previous owner can be credited toward the minimum feeding conversion period under the following conditions:
- Proof according to the VLOG Standard Annex 2
  - Proof according to the registration certificate

#### **Other species of animals (except for laying hens and poultry for fattening)**

Animal species:

- ☐ The animals purchased were verifiably fed with feed suitable for "Ohne Gentechnik" production since birth. "Ohne Gentechnik" feeding by the previous owner can be credited toward the minimum feeding conversion period under the following conditions:
- Proof according to the VLOG Standard Annex 2

#### **OUTSOURCING OF ANIMALS IN OHNE GENTECHNIK PRODUCTION**

- ☐ Animals have been outsourced since the last VLOG audit (e.g., cattle: young cattle, gestating cows). Feeding has been "Ohne Gentechnik"-compliant:

Animal category	Number of animals outsourced per calendar year	Business (name + address)	Previous owner VLOG- certified/certified under equivalent standard
Select an item			<input type="checkbox"/>
Select an item			<input type="checkbox"/>
Select an item			<input type="checkbox"/>

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment GMO cultivation</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>	
VLOG-ID or VLOG group member-ID	

## RISK ANALYSIS & RISK MANAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS

For businesses in EU countries in which GMO cultivation or the release of GMOs for research purposes is permitted or probable (currently Portugal and Spain).

The following risks for "Ohne Gentechnik" production were identified in the business:

### Risk analysis own feed production

All seeds and planting materials for one's own "Ohne Gentechnik" feed production are verifiably not subject to mandatory labelling (proof by way of declarations on seed or planting material receipts, labels).

<input type="checkbox"/> Staple/green feed	<input type="checkbox"/> Threshing crops
<input type="checkbox"/> Root crops	<input type="checkbox"/> Other: <input type="text"/>

- ☐ According to the official location register or other information, no GMO plants are cultivated or released within a radius of 10 km of one's own business premises.
- ☐ According to the official location register or other information, GMO plants are cultivated or released within a radius of 10 km of one's own business premises.
- ☐ GMO plants are cultivated by the business itself.

GMO crops (own or third-party GMO cultivation or release)		
"Ohne Gentechnik" feed production of the same crop in the business	<input type="checkbox"/> Yes	<input type="checkbox"/> Nein
Shortest distance to the business's feed crop areas		

### Risk analysis for feed handling

- ☐ (Temporary) production, storage, processing or feeding of GMO feed  
Explanation (category of animal, GMO feed, extent, duration)
- ☐ Regular switching between feeding with "Ohne Gentechnik" feed and with GMO feed  
Explanation (category of animal, GMO feed, extent, date of changeover)
- ☐ Utilisation of dual-use stationary grinding and mixing facilities  
Explanation (category of animal, GMO feed, frequency of use)
- ☐ Cross-business use of machinery or use of external service providers when handling feed (see p. 3)

The following measures to avoid future contamination with and carryover of GMO feed were derived based on the risks identified:

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment GMO cultivation</b>	<b>Version: 01.09.21</b>
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*Please describe the precise measures taken and add blueprints of storage facilities for GMO feed, feed manufacturing and handling facilities (mixing facilities, storage of equipment, feeding facilities, transport routes) as well as barns incl. animal species.*

Testing of the flow of goods for risk of the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling	Measures established to avoid contamination and carryover
<i>Feed production in the business</i>	
... during delivery of seeds	
... during storage of seeds	
... during seeding	
... during plant care (e.g., carryover during fertilisation or crop protection)	
... during harvesting	
<i>Feed handling in the business</i>	
... during delivery and filling (e.g., of silos, tanks)	
... during storage	
... during mixing	
... during handling & feeding (feed waggon, means of transport, etc.)	
Other factors in the business (that could lead to the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling)	

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment GMO Cultivation</b>	<b>Version: 01.09.21</b>
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#### Risk analysis external service providers

Please indicate here all businesses that perform services for “Ohne Gentechnik” production involving the production and handling of feed. Please also record which measures have been taken in order to prevent carryover or commingling.

Type of service	Explanation	Business (name + address)	Certification status of the service provider			Measures established to avoid contamination and carryover, if any
			VLOG- certified/ certified under equivalent	QS-certified	Other/no certification	
Mobile grinding/mixing facility			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Joint use of machinery - machinery ring			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Joint use of machinery /equipment – neighbourhood assistance			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Desiccation facility			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Others: <div></div>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



VLOG Standard Annex 20	VLOG Facility Description Agriculture Attachment Purchase of Feed	Version: 01.09.21
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Name of business		VLOG-ID or VLOG group member-ID	
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Exact description of purchased feed/commercial name	Type of feed	Supplier <i>(business &amp; address)</i>	Certification status or grade of feed according to VLOG Standard E 4.2 <i>(Please place an x next to only one feed)</i>				Categories of animals fed with this feed	Date of change <i>(for additions/ deletions)</i>
			VLOG/ recognised as equivalent	Not subject to compulsory labelling & not risk-prone	Not subject to compulsory labelling & risk- prone	GMO		
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other: <input type="text"/>	

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment Risk Analysis</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>	
VLOG-ID or VLOG group member-ID	

## RISK ANALYSIS & RISK MANAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS

For businesses in EU countries in which GMO cultivation is not permitted, and no GMOs are released.

### Risk analysis for feed handling

The following risks for "Ohne Gentechnik" production were identified in the business:

- ☐ (Temporary) production, storage, processing or feeding of GMO feed  
Explanation: (category of animal, GMO feed, extent, duration):
- ☐ Regular switching between feeding with "Ohne Gentechnik" feed and with GMO feed  
Explanation: (category of animal, GMO feed, extent, date of changeover):
- ☐ Utilisation of dual-use stationary grinding and mixing facilities  
Explanation: (category of animal, GMO feed, frequency of use):
- ☐ Cross-business use of machinery or use of external service providers when handling feed (see p. 3)

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment Risk Analysis</b>	<b>Version: 01.09.21</b>
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The following measures to avoid future contamination and carryover of GMO feed were derived based on the risks identified:

*Please describe the precise measures taken and add blueprints of storage facilities for GMO feed, feed manufacturing and handling facilities (mixing facilities, storage of equipment, feeding facilities, transport routes) as well as barns incl. animal species.*

Testing of the flow of goods for <b>risk</b> of the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling	<b>Measures</b> established to avoid contamination and carryover
... during delivery and filling (e.g., of silos, tanks)	
... during storage	
... during mixing	
... during handling & feeding (feed waggon, means of transport, etc.)	
Other factors in the business (that could lead to the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling)	

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Agriculture Attachment Risk Analysis</b>	<b>Version: 01.09.21</b>
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#### Risk analysis external service providers

Please indicate here all businesses that perform services for “Ohne Gentechnik” production involving the handling of feed after harvesting (e.g., transport, drying, storage/relocation, crushing/grinding, mixing). Please also record which measures have been taken in order to prevent carryover or commingling.

Type of service	Explanation	Business (name + address)	Certification status of the service provider			Measures established to avoid contamination and carryover, if any
			VLOG-certified/ certified under equivalent standard	QS-certified	Other/no certification	
Mobile grinding/mixing facility			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Joint use of machinery - machinery ring			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Joint use of machinery /equipment – neighbourhood assistance			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Others: <div></div>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Agriculture Stage – Animal Transport/Livestock Trade</b>	<b>Version: 01.09.21</b>
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## PART 1: BUSINESS PARAMETERS

Please fill out all tables completely, and always check the answers that are applicable to your business.

<b>Name of business</b>	
Facility number/VVVO no.	
Address of the business/site (including country code)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG ID <sup>1</sup>	

### Organizational chart

- ☐ There is an updated organisational chart for the agricultural business.
- ☐ For small facilities (according to the VLOG Standard):  
The following employees are involved in “Ohne Gentechnik” production:

Employees	Function, responsibility	Substitution provision

### Description of activities

Activity area in the VLOG production	Portion (%) of the total production	Number of animals transported or traded annually (kg, t or units)
<input type="checkbox"/> Animal transport		
<input type="checkbox"/> Livestock trade		


<sup>1</sup> 10-xxxxx cf. Standard Usage Agreement with VLOG

<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Agriculture Stage – Animal Transport/Livestock Trade</b>	<b>Version 01.09.21</b>
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## PART 2: ANIMAL INVENTORY, SUPPLIERS


### Animal Inventory

☐ The current animal inventory overview is enclosed as an attachment.

 Attachment:  
Animal inventory  
overview

### List of suppliers for “Ohne Gentechnik” production

☐ The current overview of suppliers of VLOG animals is on file.

 Attachment:  
List of suppliers

## PART 3: RATIONS & FEED


### Feed

☐ Transported/traded VLOG animals are not fed

☐ Transported/traded VLOG animals are fed

☐ Feed is produced in-house and is not subject to compulsory labelling .

☐ Purchase of feed since the last VLOG audit: The attachment on “Purchase of feed” is enclosed.

 Attachment:  
Purchase of feed

## PART 4: RISK ANALYSIS & RISK MANAGEMENT


☐ The entire business operates in accordance with the requirements for “Ohne Gentechnik” production, i.e.:

- There is no GMO feed in the business.
- There is no feeding during transport.
- There is no interim stabling/handling during transport of the VLOG animals from the supplier to the customer.

Currently there are no further measures the business needs to take to preclude future contamination with or carryover of GMO-containing feed.

☐ The business has risks affecting “Ohne Gentechnik” production (e.g., GMOs in the business, interim stabling)

The attachment on “Risk analysis” is enclosed.

 Attachment:  
Risk Analysis

<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Agriculture Stage – Animal Transport/Livestock Trade</b>	<b>Version 01.09.21</b>
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#### PART 5: SAMPLING & GMO TESTING

<input type="checkbox"/>	The transported/traded VLOG animals are not fed. No sampling and testing is needed. <i>(If the item applies, continue to Part 6)</i>
<input type="checkbox"/>	The transported/traded VLOG animals are fed.
<input type="checkbox"/>	Potentially risk-prone feed is only used in “Ohne Gentechnik” production if it is of “VLOG geprüft” quality or a quality recognised as equivalent. Sampling and testing are not necessary under the VLOG Standard. <i>(If the item applies, continue to Part 6)</i>
<input type="checkbox"/>	Potentially risk-prone feed is used for VLOG animals. According to the VLOG Standard, the business must take samples (reference samples) and test the feed used in “Ohne Gentechnik” production for GMOs. The business has a written sampling and testing plan.

#### PART 6: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

Attachments also applicable to the facility description:

- ☐ Attachment Animal inventory overview
- ☐ Attachment List of suppliers
- ☐ Attachment Purchase of feed
- ☐ Attachment Risk analysis

The business itself checks the facility description once each calendar year, and it is up-to-date.  
I/we hereby declare the correctness of the information provided above.

Year of examination	202 <input type="text"/>	202 <input type="text"/>	202 <input type="text"/>
Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
Function	<input type="text"/>	<input type="text"/>	<input type="text"/>
Risk category (grading by the group organiser or prior certification)	<input type="text"/>	<input type="text"/>	<input type="text"/>
Date	<input type="text"/>	<input type="text"/>	<input type="text"/>
Signature	<input type="text"/>	<input type="text"/>	<input type="text"/>

<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Animal Transport/Livestock Trade Attachment Animal inventory overview</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>		<b>VLOG-ID</b>	
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Please enter all animals or categories of animal traded / transported by your business.

Animal species/animal category	VLOG animals		Animals of other quality			Remarks (interim stabling/handling, indicating GMO feed, other)
	Transport/ carriage	Feeding of animals during transport/carriage	Transport/carriage	Feeding of animals during trade/transport Only feed not subject to compulsory labelling	Also feed subject to compulsory labelling	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Select an item	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other: <input type="text"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Agriculture Attachment List of suppliers</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>		<b>VLOG-ID</b>	
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Please enter here ALL suppliers of "VLOG" animals that are relevant in your business.

Name of business	"VLOG" animals/animal categories transported/traded	Certification status	Date of change (in case of additions/deletions)
		VLOG certification/certification recognised as equivalent exists	
	Select an item	<input type="checkbox"/>	
	Select an item	<input type="checkbox"/>	
	Select an item	<input type="checkbox"/>	
	Select an item	<input type="checkbox"/>	
	Select an item	<input type="checkbox"/>	
	Select an item	<input type="checkbox"/>	
	Select an item	<input type="checkbox"/>	
	Other: <input type="text"/>	<input type="checkbox"/>	

<b>VLOG Standard Annex 20</b>	<b>VLOG Facility Description Animal Transport/Livestock Trade Attachment Purchase of Feed</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>		<b>VLOG-ID or VLOG group member-ID</b>	
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Exact description of purchased feed/commercial name	Type of feed	Supplier <i>(business &amp; address)</i>	Certification status or grade of feed according to VLOG Standard E 4.2 <i>(Please place an x next to only one feed)</i>				Categories of animals fed with this feed	Date of change <i>(for additions/ deletions)</i>
			VLOG/ recognised as equivalent	Not subject to compulsory labelling & not risk-prone	Not subject to compulsory labelling & risk- prone	GMO		
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Select an item	
	Select an item		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other: <input type="text"/>	

<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Animal Transport/Livestock Trade Attachment Risk analysis</b>	<b>Version: 01.09.21</b>
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<b>Name of business</b>	
VLOG-ID	

## **RISK ANALYSIS & RISK MANAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS**

### **Risk analysis for feed handling**

The following risks for "Ohne Gentechnik" production were identified in the business:

- ☐ (Temporary) presence of GMO feed  
Explanation (category of animal, GMO feed, extent, duration):
- ☐ Interim stabling/handling of VLOG animals  
Explanation (duration, feeding):
- ☐ Simultaneous transport of "VLOG" animals and animals of a different quality in a single means of transport/transport container or mixed interim stabling at a stopover.  
Explanation (labelling):
- ☐ Feeding of animals during transport or interim stabling  
Explanation (feed):

<b>VLOG Standard Annex 21</b>	<b>VLOG Facility Description Animal Transport/Livestock Trade Attachment Risk analysis</b>	<b>Version: 01.09.21</b>
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The following measures to avoid future contamination and carryover of GMO feed/swapping of animals of different quality were derived from the risks identified:

*Please describe the precise measures taken and add blueprints of storage facilities for GMO feed, feed manufacturing and handling facilities (mixing facilities, storage of equipment, feeding facilities, transport routes) as well as barns incl. animal species.*

Testing of the flow of goods for <b>risk</b> of entry, carryover, admixture and/or swapping	<b>Measures</b> established to avoid contamination, carryover and swapping
... during delivery and filling (e.g., of silos, tanks)	
... during storage	
... during mixing	
... during handling & feeding (feed waggon, means of transport, etc.)	
... during transport/interim stabling of animals	
Other factors in the business (that could lead to entry, carryover, admixture and/or swapping)	

**VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for the Agricultural Stage including Animal Transportation + Animal Trade**
**V22.01**

Date of audit: \_\_\_\_\_

Duration of audit (time from - to): \_\_\_\_\_

Auditor: \_\_\_\_\_

Combination with other standard(s): \_\_\_\_\_

Responsible certification body: \_\_\_\_\_

VLOG-ID (10-xxxxx) or Group Organiser: \_\_\_\_\_

Business: \_\_\_\_\_

Identification number if available: \_\_\_\_\_

Sites that have been audited (incl. adress): \_\_\_\_\_

 Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal? ☐ yes ☐ no

 Is there a Licence Agreement with VLOG in place? ☐ yes ☐ no

 Sampling during audit: ☐ yes ☐ no

Auditor's signature: \_\_\_\_\_

Business risk grading (transferred from facility description): \_\_\_\_\_

Focus of facility inspection: \_\_\_\_\_

Stage of certification: \_\_\_\_\_

Business's signature: \_\_\_\_\_

Auditor:

Correction Evaluator:

No. in Standard	Topic in Standard		Grading (please select with " x ")							Corrective actions	
			A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E 3	General Requirements for the Agricultural Stage (also relevant für Livestock Trade/Animal Transport)										
E3.1	Facility Description										
E3.2	Assignment of Responsibilities/Organisational Chart										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E3.3	Risk Management										
E3.4	Joint Use of Machines, Facilities/External Service Providers										
E3.5	Handling of Non-compliant Feed, Products and Animals	KO									
E3.6	Traceability	KO									
E3.7	Complaint Management										
E3.8	Crisis Management	KO									
E3.9	Corrective Action										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E3.10	Documentation and Retention Period										
E3.11	Staff Training										
E3.12	Self-monitoring										
<b>E 4</b>	<b>Specific Requirements for Animal-based Production (also relevant for Livestock Trade/ Animal Transport)</b>										
E4.1	Animal Inventory										
E4.2	Risk-Prone Feed										
E4.3	Feed Ordering										
E4.4	Feed List										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E4.5	Feed Rations										
E4.6	Incoming Goods Inspection of Feed <i>(N.A. only selectable for livestock trade/transporters who do not apply feed)</i>	KO									
E4.7	Compliance with Minimum Feeding Conversion Periods <i>(N.A. only selectable for transporters)</i>	KO									
E4.8	Segregation of Goods Flows/Exclusion of Carryover from GMO Feed, Commingling and Swapping	KO									
E4.9	Use of Grinding and /or Mixing Facilities	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A.									
E4.9.1.1	Joint use of grinding and/or mixing facilities:  Contractual Agreement with the Facility Operator										



No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E4.9.1.2	Joint use of grinding and/or mixing facilities:  Specific Measures to Eliminate Carryover of GMO Feed										
E4.9.1.3	Joint use of grinding and/or mixing facilities:  Documentation of Feed Mixture										
E4.9.2.1	Use of stationary grinding and/or mixing facilities:  Use of Grinding and Mixing Facilities exclusively for Feed Not Subject to Compulsory Labelling										
E4.9.2.2	Use of stationary grinding and/or mixing facilities:  Dual Use of Grinding and Mixing Facilities exclusively for Feed Not Subject to Compulsory Labelling and for Feed Subject to Compulsory Labelling										
E4.9.2.3	Use of stationary grinding and/or mixing facilities:  Specific Measures to Eliminate Carryover of GMO Feed										
E4.9.2.4	Use of stationary grinding and/or mixing facilities:  Documentation of Feed Mixture										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E4.10	Sampling and Testing	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A.									
E4.10.1	Sampling and Testing Frequency of Reference Samples Retention										
E4.10.2	Sampling and Testing Plan										
E4.10.3	Reduction of the Scope of Testing after Feed Switching in Group Organisations										
E4.11	Outgoing goods inspection/markings on goods accompanying documents										
E5	Specific Requirements for Plant-based Feed Production	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A.									
E5.1	Incoming Goods Inspection	KO									

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
E5.2	Segregation of Goods Flows / Exclusion of Commingling and Swapping	KO									
E6	Specific Requirements for Animal Transport/Livestock Trade	If this sub-stage is not relevant for the company, all points are graded as N.A.. If the sub-stage is relevant, KO criteria may not be graded as N.A.									
E6.1	Incoming Goods Inspection of Animals	KO									
E6.2	Risk Management										
E6.3	Segregation of Goods Flows/Exclusion of Commingling and Swapping of animals	KO									

#### Grading

Number of A criteria	0	not passed
Number of B criteria	0	
Number of C criteria	0	
Number of N.A. criteria	0	
Number of Knock Outs	0	
Number of risks	0	
Total points	0,00	
Maximum achievable number of points	360,00	
Number of evaluated criteria	0	not passed
Achieved percentage	missing or incorrect entries!	

<b>VLOG Standard Annex 23</b>	<b>VLOG Group Description in Agriculture and Members List</b>	<b>Version 04.11.21</b>
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The following is a sample template for a group description. A group description must be submitted to the certification body at the time of the application. The group organiser must notify the certification body of any major changes pertaining to VLOG certification.

## Group description of sample group “SaGro GmbH”

### Group organiser:

*SaGro GmbH*

*Sample street 12, 54321 Sample town*

### Responsible for group certification:

*Sam Sample (QM officer of Sample GmbH)*

Phone: 0123 4567 89

Email: s.sample@samplegmbh.com

### Activities of group members:

*Sample text: The members of the SaGro VLOG group are agricultural operations that keep dairy cows and produce raw milk that complies with the requirements of the VLOG Standard [...]. The agricultural operations refrigerate the milk, but do not treat it otherwise. The milk is sold directly to SaGro GmbH. Some smaller quantities of milk are also sold directly from the farm to consumers [...].*

*The agricultural operations are mainly located in the administrative districts/federal states/countries [...].*

*Some operations are also engaged in other agricultural activities such as cattle and pig fattening or egg production [...]; however, these activities are not part of the SaGro VLOG group.*

### Contractors, subcontractors and outsourced processes:

*The following contractors are included in the SaGro group:*

- *Transpofix GmbH, Feedstreet 8, 12345 Sampleville*

*Contact person:*

*Contact information:*

*Transpofix GmbH transports the raw milk from members to the dairy plant [...] on behalf of SaGro GmbH. It takes samples, records milk quantities [...]*

- *[...]*

### Areas of responsibility of the group organiser:

*Sample text: SaGro prepares and monitors the [...] group’s sampling and test plan. It commissions the sampling within the scope of the VLOG audit by the certification body [...]*

*SaGro arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective actions together with the affected businesses [...].*

<b>VLOG Standard Annex 23</b>	<b>VLOG Group Description in Agriculture and Members List</b>	<b>Version 04.11.21</b>
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*SaGro assumes the risk management for the milk production sector and maintains a crisis management system that involves the group members [...].*

*SaGro GmbH carries out an internal audit of the agricultural operations annually.*

*[...]*

#### **Basis for initial and subsequent certifications**

*Sample text: The group operates according to the 25% method: 100% of the members are audited by the group organiser; after that, the certification body audits a minimum of 25% of the members. In subsequent years, the audits by the certification body will take place based on risk grading.*

*Or:*

*The group operates according to the 100% method: 100% of the members are audited by the certification body before they can be added to the group. In subsequent years, the audits by the certification body will take place based on risk grading.*

#### **Use of multiple certification bodies**

*[If multiple certification bodies are used, the group description must clearly indicate which tasks are to be performed by which certification body.]*

*Sample text: Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaGro group.*

*A-cert audits the group organiser and the following part of the group [list the agricultural operations, the region or another reference list such as the members list].*

*Auditing by B-cert [see list above]. Auditing by C-cert [see list above].*

*B-cert and C-cert must share their audit results with A-cert, which will then issue the VLOG certificate to the group. The certification bodies have entered into a data sharing agreement.*

<b>VLOG Standard Annex 23</b>	<b>VLOG Group Description in Agriculture and Members List</b>	<b>Version 04.11.21</b>
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Examples of filled-out members lists for group certification in agriculture (Annex 23a) and group certification in agriculture with laying hens (Annex 23b) can be found below. The members list must always be kept up to date by the group organiser. The group organiser has to immediately notify the certification body of any relevant changes. The Excel template, which is available on the VLOG website, must always be used to exchange data with the certification body (entire list or area marked in blue) and to transfer data to VLOG (area marked in green).

#### Sample members list (Annex 23a) - Part 1/2

Data exchange between the group organiser and certification body.									
<b>VLOG Members List</b>									Continued in Part 2/2 (see below)
									[...]
									[...]
Group member business name	Country code + postal code, if any	Site	Street and house number	Contact person	Email	Telephone	VVVO No. /official approval no.	Date of initial data collection by GO	[...]
Hans Müller	BB 12345	Feldkirchen	Feldweg 2	Hans Müller	hmueller@anbieter.de	0123 45675	123 04 567 089 xxxx	14.04.19	[...]
Milchhof Max	BW 98765	Milchbach	Am Milchhof 1	Max Bauer	milchhof@anbieter.de	0987 56765	987 06 543 021 xxxx	03.07.20	[...]
[...]									[...]

#### Sample members list (Annex 23a) - Part 2/2

Data exchange between the group organiser and certification bodies.										
Continued from Part 1/2 (see above)	Data transfer to VLOG:									
	Operation (group organiser):							VLOG-ID:	As of:	
	.....							.....	.....	
[...]	Group member-ID	Postal code (123xx)	Areas of applicability	Risk category	Audit date (initial audit/ routine audit)	Audit result (%)	VLOG group entry date	VLOG group exit date	VLOG certification body	
[...]	10-12345-123	123xx	Cattle – cow's milk (raw)	0	23.05.2020	100	03.06.19		Name of cert. body	
[...]	10-12345-987	987xx	Cattle – cow's milk (raw)	2	Has not yet taken place	100	05.07.20		Name of cert. body	
[...]										

## Anonymised transmission of stable spaces

*Please use one line for each business!*

*Only for the animal category within the scope of application of your group certification*

[illegible]

\* For the first report in 2023, the number can be calculated based on the milk yield of the business and the average yield per dairy cow this one time.

\*\*If animals are pasture-fed, please indicate the equivalent number of animals

**Anonymised transmission of test results (feed)**

<b>Operation (group organiser):</b>	
<b>VLOG-ID:</b>	
<b>As of (date):</b>	

**Analysis of the number of test results from previous calendar year**

	Number of GMO tests performed according to the VLOG Standard in previous calendar year
	Of which, permissible for VLOG production* /not subject to compulsory labelling
	Of which, impermissible for VLOG production* /subject to compulsory labelling

**List of test results for feed graded as impermissible (GMO %, totalled per plant species):**

	Soy	Corn/maize	Rapeseed/ Canola	Sampling date	Notes
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					

\*cf. Flow chart VLOG Standard Annex 5



<b>VLOG Standard Annex 23e</b>	<b>Template Data Release Statement</b>	<b>Version 01.09.21</b>
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Name, first name of the data subject (farmer):

Address of the agricultural business:

#### **Declaration of consent for the processing of personal data in accordance with the GDPR**

I consent to the transfer of the following personal data:

- name, first name (if included in the business name)
- address, email address, telephone number
- scope of applicability of the certification
- risk category
- audit date and results
- start and end date of the membership in the VLOG group
- identification number
- VVVO number
- print number
- stable space overview
- evaluation and overview of the test results

from (group organiser):

and the relevant certification body:

to Verband Lebensmittel Ohne Gentechnik e.V., Friedrichstraße 153 a, 10117 Berlin ("VLOG"). The group organiser is contractually entitled to use the VLOG "Ohne Gentechnik" Production and Certification Standard (VLOG Standard). Within the scope of this contractual relationship, VLOG undertakes to treat the aforementioned personal data confidentially and to only use them in internal assessments. VLOG does have the right to publish the aforementioned data in an anonymous manner (e. g. in statistics).

#### **Right of withdrawal**

The undersigned has the right to withdraw consent at any time with future effect without giving any reason. If consent is withdrawn, the group organiser shall immediately inform VLOG. The withdrawal of consent does not affect the lawfulness of data processing based on consent that was done before the withdrawal.

Place, date

Signature of the agricultural business

**VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for the Group Organisation – Agriculture Stage**
**V22.01**

Date of audit: \_\_\_\_\_

Duration of audit (time from - to): \_\_\_\_\_

Auditor: \_\_\_\_\_

Combination with other standard(s): \_\_\_\_\_

Responsible certification body:: \_\_\_\_\_

VLOG-ID (10-xxxxx): \_\_\_\_\_

Business: \_\_\_\_\_

Identification number if available: \_\_\_\_\_

Sites that have been audited (incl. adress): \_\_\_\_\_

 Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal? ☐ yes ☐ no

 Is there a Licence Agreement with VLOG in place? ☐ yes ☐ no

Stage of certification: \_\_\_\_\_

 Sampling during audit: ☐ yes ☐ no

Auditor's signature: \_\_\_\_\_

Business's signature: \_\_\_\_\_

No. in Standard	Topic in Standard		Grading (please select with " x ")						Evaluation/Explanation	Corrective actions	
			A	B	C	N.A. (not applica	Risk	KO (Knock Out)		Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
<b>F 3</b>	<b>General Requirements Group Organiser</b>										
F3.1	Group Description, Member List, Facility Description										
F3.2	Contractual Binding of Group Members	<b>KO</b>									
F3.2.1	Data release declaration (only group organisation laying hens - eggs)										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
F3.3	Risk Management	KO									
F3.4	Commissioning external Service Providers										
F3.5	Implementation of the Requirements for Sampling and Testing										
F3.6	Training of Staff and Group Members by the Group Organiser										
F3.7	Handling of Non-compliant Feed, Products and Animals	KO									
F3.8	Complaint Management										
F3.9	Crisis Management	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applica	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
F3.10	Corrective Action/Continuous Improvement Process										
F3.11	Documentation and Retention Periods										
F3.12	Internal Audits										

#### Grading

Number of A criteria  
 Number of B criteria  
 Number of C criteria  
 Number of N.A. criteria  
 Number of Knock Outs  
 Number of risks  
 Total points  
 Maximum achievable number of points  
  
 Number of evaluated criteria  
 Achieved percentage

0
0
0
0
0
0
0,00
130,00
0
missing or incorrect entries!

not passed

<b>VLOG Standard Annex 25</b>	<b>VLOG Facility Description Food Processing/Preparation Stage</b>	<b>Version 13.09.21</b>
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## PART 1: BUSINESS PARAMETERS

Please fill out all tables completely, and always check the answers that are applicable to your business.

<b>Name of business</b>	
Official approval or registration number (in accordance with Regulation EC No. 183/2005)	
Address of the business/site (including country code)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG ID <sup>1</sup>	

### Description of activities

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion (%) of the total production	Volume produced annually (kg, t or units)

### Use of the “Ohne GenTechnik” seal

- ☐ The “Ohne GenTechnik” seal is used on the following documents/media to label VLOG-certified food. A licence agreement with VLOG is on file:
- ☐ Labels, declarations
 ☐ Delivery slips, invoices
 ☐ Website
 ☐ Other media (flyers, catalogues, etc.)

<sup>1</sup> (10-xxxxx cf. Standard Usage Agreement with VLOG)

<b>VLOG Standard Annex 25</b>	<b>VLOG Facility Description Food Processing/Preparation Stage</b>	<b>Version 13.09.21</b>
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## PART 2: ORGANISATION OF THE “VLOG” PRODUCTION

### Other sites

- ☐ No other sites are included in „Ohne Gentechnik“ certification.
- ☐ Other sites are included in „Ohne Gentechnik“ certification.

Name of the business	Address	Activity/process

☐ For others, see informal attachment

### Subcontractors/contract processors

- ☐ No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- ☐ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/certified under a standard recognised as equivalent or included in the business' own VLOG certification)

☐ For others, see informal attachment

## PART 3: SAMPLING & GMO TESTING

- ☐ Sampling and testing are not required:
- ☐ All raw materials/products used are certified under the VLOG Standard or another standard recognised as equivalent (*If the item applies, continue to Part 4*)
- ☐ There is a risk analysis (in writing) indicating why NO sampling or reduced sampling and GMO testing is possible. This applies, e.g., when ingredients cannot be analysed. If there is a reduction, the business must have a written sampling and testing plan.  
([Information sheet “Testability of raw materials”](#))
- ☐ Requirement of sampling (reference samples) and testing of food in “Ohne Gentechnik” production.  
The business has a written sampling and testing plan.

<b>VLOG Standard Annex 25</b>	<b>VLOG Facility Description Food Processing/Preparation Stage</b>	<b>Version 13.09.21</b>
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#### **PART 4: DOCUMENTS TO BE PREPARED**

The following information must be provided to the certification body/auditor, or must be examined during the audit.

- List of all raw materials and other production means (e.g. flavours, enzymes, cultures of microorganisms, additives, processing aids and other food ingredients) that are used in the “VLOG” products. The list must include, at a minimum, the following information:
  - Exact name of the raw material or other production means
  - Specification of GMO documentation on file (e.g. VLOG non-GMO certification, reference to Regulation (EC) 834/2007)
- List of “VLOG” products (products with the “Ohne GenTechnik” seal, B2B products, indicate print number in case of packing facilities)

#### **PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION**

The business itself checks the facility description once each calendar year, and it is up-to-date.  
I/we hereby declare the correctness of the information provided above.

Year of examination	202...	202...	202...
Name			
Function			
Risk category			
Date			
Signature			

VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for the Food Processing/Preperation Stage

V22.01

Date of audit:

Auditor:

Responsible certification body::

Business:

Sites that have been audited (incl. adress):

Sampling during audit:

☐ yes

☐ no

Auditor's signature:

Duration of audit (time from - to):

Combination with other standard(s):

VLOG-ID (10-xxxxx):

Identification number if available:

Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal?

☐ yes

☐ no

Is there a Licence Agreement with VLOG in place?

☐ yes

☐ no

Business risk grading (transferred from facility description):

Auditor:

Correction Evaluator:

Focus of facility inspection:

Scope of certification:

Business's signature:

No. in Standard	Topic in Standard		Grading (please select with " x ")						Evaluation/Explanation	Corrective actions	
			A	B	C	N.A.	Risk	KO (Knock Out)		Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
G 3	General Requirements for the Food Processing/Preparation Stage										
G3.1	Facility Description										
G3.2	Assignment of Responsibilities/Organisational Chart										



No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
<b>G 3</b>	<b>General Requirements for the Food Processing/Preparation Stage</b>										
G3.3	Risk Management	KO									
G3.4	Commissioning of external service providers										
G3.5	Incoming Goods Inspection	KO									
G3.6	Segregation of Goods Flows/Exclusion of Commingling and Swapping	KO									
G3.7	Handling of Non-Compliant Raw Materials/Products	KO									

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
<b>G 3</b>	<b>General Requirements for the Food Processing/Preparation Stage</b>										
G3.8	Inspection of Outgoing Goods/Labelling on Bills of Lading	KO									
G3.9	Traceability	KO									
G3.10	Complaint Management										
G3.11	Goods Recall										
G3.12	Crisis Management	KO						x			

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
<b>G 3</b>	<b>General Requirements for the Food Processing/Preparation Stage</b>										
G3.13	Corrective Action/Ongoing Improvement Process										
G3.14	Documentation and Retention Period										
G3.15	Staff Training										
G3.16	Internal Audits										
<b>G 4</b>	<b>Specific Requirements for plant origin of Raw Materials</b>										
G4.1/ G.4.1.1	Sampling and Testing Sampling and analysis plan										

No. in Standard	Topic in Standard		A	B	C	N.A.	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total ppoints	not passed			
<b>G 3</b>	<b>General Requirements for the Food Processing/Preparation Stage</b>										
G4.1/ G.4.1.2	Sampling and Testing Sampling and analysis frequency										
G4.1/ G.4.1.3	Sampling and Testing Dealing with positive analysis results										
<b>G 5</b>	<b>Specific Requirements for Risk-Prone Raw Materials/Ingredients</b>										
G5	Specific Requirements for Risk-Prone Raw Materials/Ingredients										

#### Grading

Number of A criteria	0	
Number of B criteria	0	
Number of C criteria	0	
Number of N.A. criteria	0	
Number of Knock Outs	1	
Number of risks	0	
Total points	0,00	
Maximum achievable number of points	200,00	
Number of evaluated criteria	1	
Achieved percentage	missing or incorrect entries!	not passed

<b>VLOG Standard Annex 27</b>	<b>Template for Group Description in Retail – Sale of Bulk Goods including Members List</b>	<b>Version 01.09.21</b>
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This document is a sample template for a group description. A group description must be submitted to the certification body at the time of the application. The group organiser must notify the certification body of any major changes pertaining to VLOG certification.

## **Group description of “SaGroRe GmbH” retail sample group**

### **Group organiser:**

*SaGroRe GmbH*

*Sample street 12, 54321 Sample town*

### **Responsible for group certification:**

*Sam Sample (QM Officer of SaGroRe GmbH)*

Phone: 0123 4567 89

Email: s.sample@sagrore.com

### **Activities of group members:**

*Sample text: The members of the SaGroRe VLOG group are branches of SaGroRe GmbH, in which bulk food of animal origin that meets the requirements of the VLOG Standard is sold directly to consumers [...].*

*The branches further process bulk food of animal origin. The processing is organised as follows:*

*The branches are mainly located in the administrative districts/federal states/countries of [...].*

### **Contractors, subcontractors and outsourced processes:**

*The following contractors are included in the SaGroRe group:*

### **Areas of responsibility of the group organiser:**

*Sample text: SaGroRe is responsible for risk management of distributing “VLOG” quality bulk food of animal origin and has a crisis management system, in which the group members are integrated [...].*

*SaGroRe arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective measures together with the affected companies [...].*

*SaGroRe GmbH carries out an internal audit of the branches annually. [...]*

### **Basis for the initial and subsequent certifications**

*Sample text: SaGroRe’s purchasing of “VLOG” food is centrally regulated. Therefore, in addition to the audit of the group organiser, the certification body will carry out random audits annually at 10% of the branches.*

*Or:*

*SaGroRe’s purchasing of “VLOG” food is regulated on a decentralised basis. The certification body will carry out audits of the group organiser and 100% of the branches annually.*

<b>VLOG Standard Annex 27</b>	<b>Template for Group Description in Retail – Sale of Bulk Goods including Members List</b>	<b>Version 01.09.21</b>
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#### **Use of several certification bodies**

[If multiple certification bodies are used, the group description must clearly indicate which tasks are to be performed by which certification body.]

*Sample text: Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaGroRe group.*

*A-cert audits the group organiser and the following part of the group [list containing the branches, the region, or another reference list such as the members list].*

*B-cert will audit [see list above]. C-cert will audit [see list above].*

*B-cert and C-cert give their audit results to A-cert, which will issue the VLOG certificate to the group. There is an agreement between the certification bodies for the exchange of data.*

#### **Other documents** [integrated into the group description or as extra documents]

- Organisational chart: Organisational chart of the business incl. responsibilities and a representation plan to cover absences in operating procedures relevant to “Ohne Gentechnik”.
- List of products: Overview or specifications for bulk “Ohne Gentechnik” goods offered by the business, including consideration of re-working
- For further processing of bulk “Ohne Gentechnik” goods and the use of further ingredients which are not purchased from VLOG certified suppliers (e.g. marinades, spice blends): A list of all formulations with quantity or weight-related information on “Ohne Gentechnik” ingredients and components, including consideration of re-working
- List of suppliers: All authorised suppliers of “Ohne Gentechnik” food/ingredients

<b>VLOG Standard Annex 27</b>	<b>Template for Group Description in Retail – Sale of Bulk Goods including Members List</b>	<b>Version 01.09.21</b>
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This section contains a sample template of a member list for group certification in agriculture. The group organiser must always keep the member list up to date. The group organiser has to promptly notify the certification body of any relevant changes. The following member list below or a member list with equivalent content may be used. *[Information in boldface is mandatory according to the Standard; the remainder is recommended.]*

#### List of members/sites of SaGroRe GmbH

<b>Name/ Branch</b>	<b>Address</b>	<b>Centralised or decentralised purchase</b>	<b>Group member since</b>	<b>Most recent routine audit/initial audit by the certification body</b>	<b>Responsible certification body<sup>1</sup></b>
<i>SaGroRe Sample town</i>	<i>Sample street 2, 87654 Sample town</i>	<i>centralised</i>	<i>[Date]</i>	<i>[Date]</i>	<i>A-Cert</i>
<i>Retail site, city, Sample city</i>	<i>Main street 1, 54321 Sample city</i>	<i>decentralised</i>	<i>[Date]</i>	<i>Has not yet taken place</i>	<i>C-Cert</i>
<i>[...]</i>					

<sup>1</sup> Only relevant if the group uses multiple certification bodies for VLOG certification

## VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for the Retail Stage - Sale of bulk food of animal origin -Group organiser

V22.01

Date of audit: \_\_\_\_\_

Duration of audit (time from - to): \_\_\_\_\_

Auditor: \_\_\_\_\_

Combination with other standard(s): \_\_\_\_\_

Responsible certification body:: \_\_\_\_\_

VLOG-ID (10-xxxxx): \_\_\_\_\_

Business: \_\_\_\_\_

Identification number if available: \_\_\_\_\_

Sites that have been audited (incl. adress): \_\_\_\_\_

Does the company use the "Ohne GenTechnik" or "VLOG geprüft"-seal? ☐ yes ☐ no

Is there a Licence Agreement with VLOG in place? ☐ yes ☐ no

Scope of Certification: \_\_\_\_\_

Sampling during audit: ☐ yes ☐ no

Auditor's signature: \_\_\_\_\_

Business's signature: \_\_\_\_\_

No. in Standard	Topic in Standard	Grading (please select with " x ")						KO (Knock Out)	Evaluation/Explanation	Corrective actions	
		A	B	C	N.A. (not applicable)	Risk				Corrective action (business)	Responsibility/ dates/status (business)
		10 points	5 points	-10 points	N.A.	-15% of total points		not passed			
H 3	General Requirements for the Retail Stage – Sale of Bulk Food of Animal Origin										
H3.1	Group Description										
H3.2	Contractual Binding of the Group Members	KO									



No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
H3.3	Risk Management	KO									
H3.4	Procurement (Suppliers and Producer Certification)										
H3.5	Incoming Goods Inspection	KO									
H3.6	Segregation of Goods Flows/Exclusion of Commingling and Swapping	KO									
H3.7	Processing										

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
H3.8	Training of Staff and Group Members by the Group Organiser										
H3.9	Handling of Non-compliant Raw Materials/Products	KO									
H3.10	Labelling										
H3.11	Traceability	KO									
H3.12	Crisis Management	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
H3.13	Corrective Action/Ongoing Improvement Process										
H3.14	Documentation and Retention Periods										
H3.15	Internal Audits										

#### Grading

Number of A criteria  
 Number of B criteria  
 Number of C criteria  
 Number of N.A. criteria  
 Number of Knock Outs  
 Number of risks  
 Total points  
 Maximum achievable number of points  
  
 Number of evaluated criteria  
 Achieved percentage

0
0
0
0
0
0
0,00
150,00
0
missing or incorrect entries!

not passed

## VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist for the Retail Stage - Sale of bulk Food of animal Origin - Branch

V22.01

Date of audit: \_\_\_\_\_

Duration of audit (time from - to): \_\_\_\_\_

Auditor: \_\_\_\_\_

Combination with other standard(s): \_\_\_\_\_

Responsible certification body:: \_\_\_\_\_

Business: \_\_\_\_\_

Identification number if available: \_\_\_\_\_

Sites that have been audited (incl. adress): \_\_\_\_\_

Does the company use the "Ohne GenTechnik"-seal? ☐ yes ☐ no

Scope of Certification: \_\_\_\_\_

Sampling during audit: ☐ yes ☐ no

Auditor's signature: \_\_\_\_\_

Business's signature: \_\_\_\_\_

No. in Standard	Topic in Standard		Grading (please select with " x ")						Corrective actions		
			A	B	C	N.A. (not applica ble)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
H 3	General Requirements for the Retail Stage – Sale of Bulk Food of Animal Origin										
H3.5	Incoming Goods Inspection	KO									
H3.6	Segregation of Goods Flows/Exclusion of Commingling and Swapping	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
H3.7	Processing										
H3.8	Training of Staff and Group Members by the Group Organiser										
H3.9	Handling of Non-compliant Raw Materials/Products	KO									
H3.10	Labelling										
H3.11	Traceability	KO									
H3.12	Crisis Management	KO									

No. in Standard	Topic in Standard		A	B	C	N.A. (not applicable)	Risk	KO (Knock Out)	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 points	5 points	-10 points	N.A.	-15% of total points	not passed			
H3.13	Corrective Action/Ongoing Improvement Process										
H3.14	Documentation and Retention Periods										
H3.15	Internal Audits										

#### Grading

Number of A criteria  
 Number of B criteria  
 Number of C criteria  
 Number of N.A. criteria  
 Number of Knock Outs  
 Number of risks  
 Total points  
 Maximum achievable number of points  
  
 Number of evaluated criteria  
 Achieved percentage

0
0
0
0
0
0
0,00
110,00
0
missing or incorrect entries!

not passed

<b>VLOG Standard Annex 30</b>	<b>VLOG Grinding and Mixing Protocol for Mobile Grinding and Mixing Facilities</b>	<b>Version: 01.09.20</b> <b>Obligatory as of:</b> 01.01.21
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**Agricultural operation, address (company stamp, if applicable):**

**Operator of the mobile grinding and mixing facility, address (company stamp, if applicable):**

**Mobile grinding and mixing facilities used (licence plate number):**

**Previous feed mixture produced from:**

☐ exclusively feed not subject to compulsory labelling\*

☐ (including) the following feeds subject to compulsory labelling\*\*:

Measures implemented to prevent carryover of GMO feed:

☐ Removal of residues

☐ Purges, consisting of type and amount:

Where was the purge batch used?

**Feed mixture made for “Ohne Gentechnik” production:**

Compound feed description (animal type/category/phase):		
Single-component feed	Silo no./description/ storage location	Amount (kg)
<b>Total:</b>		

With their signature below, both the agricultural business and the facility operator confirm the accuracy of the above information.

DATE

BUSINESS SIGNATURE

SIGNATURE  
OF FACILITY OPERATOR

1/1

\*Feed which is not subject to compulsory labelling as “genetically modified” according to Regulations (EC) No. 1829/2003 or No. 1830/2003

\*\* Must only be specified by non-VLOG-certified mobile grinding and/or mixing facilities

## Explanations for the VLOG Incident Sheet

### - Feed Manufacturing and Logistics Stages

*Note: In case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective matrix locations. Please use the VLOG Matrix Certification Incident Sheet for this purpose.*

#### 1. What are “incidents” within the meaning of the VLOG Standard?

“Incidents” are scenarios in which non-VLOG-compliant feed is placed on the market as “VLOG geprüft” or with the “VLOG geprüft” seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of feed manufacturing and logistics:

- GMO feed subject to compulsory labelling under EU Regulations 1829/2003 and 1830/2003<sup>1</sup> was marketed as “VLOG geprüft”<sup>2</sup>
- Feed containing GMOs that are not approved in the EU was marketed as “VLOG geprüft”<sup>3</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business’s VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

Certified businesses must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG.

In this case, each business has to fill out a separate incident sheet, but one incident sheet can be used for multiple locations of a single business. In the case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective matrix locations.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an incident report).

**As a general rule, the sooner a case is reported to VLOG the better, even if the information is still incomplete.**

#### 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

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<sup>1</sup> Under those regulations, the GMO content of the feed components may not exceed 0.9%. Values between 0.1% and 0.9% are only permissible if they are accidental or technically unavoidable.

<sup>2</sup> [Guideline on handling mislabelled GMO feed](#)

<sup>3</sup> The quantity of non-approved GMOs in the feed is irrelevant.



Sign and submit to VLOG e.V.:

Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents:

VLOG Head Office: +49 (0)30 2359 945 00

Outside of business hours: +49 (0)30 2359 945 09

## 1. Information regarding the business

Name of Business		
Business Activity Area	<input type="checkbox"/> Logistics stage <input type="checkbox"/> (Drop) shipping <input type="checkbox"/> Storage/handling <input type="checkbox"/> Transport <input type="checkbox"/> Feed Manufacturing stage <input type="checkbox"/> Manufacturing/processing <input type="checkbox"/> Grinding and mixing facility <input type="checkbox"/> Business is part of a VLOG matrix certification	
Business Address	Street address	
	Postal code, city	
	Country	
VLOG ID <sup>4</sup>		
Emergency contact person for VLOG	Name	
	Telephone number	
	Email/Fax	
VLOG certification body	Name	
	<input type="checkbox"/> The certification body has already been informed of the incident → If this is not the case, please do so immediately	
Business locations affected by the incident (including Sub ID, if any):		

## 2. Information regarding the incident

## Type of incident

☐ Positive GMO test result for a feed sample  
☐ Error/commingling within the business (e.g. feed in the wrong silo)  
☐ Error/commingling in another business:   
☐ Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you become aware of the incident?

How did you learn of the incident?

<sup>4</sup> Businesses that are part of a matrix certification do not have their own VLOG IDs. Enter the name of the business that represents the business as matrix organiser.

## Feed affected by the incident (please list additional feed on a separate sheet)

☐ Feed from own production – date of manufacture:

☐ Feed purchased from a supplier:

Address:

Contact person:

Delivery date:

☐ Feed in contract manufacturing for:

Address:

Contact person:

Unique name of the feed (commercial name)	<input type="text"/>		
Type of feed	<input type="checkbox"/> feed material <input type="checkbox"/> Compound feed <input type="checkbox"/> Other: <input type="text"/>		
Batch number <sup>5</sup>	<input type="text"/>		
Total quantity affected	<input type="text"/>		
- thereof already placed on the market	<input type="text"/>		
Marketing period	<input type="text"/>	to	<input type="text"/>

- ☐ Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>6</sup>
- ☐ A list of affected customers is attached. The list includes quantities and delivery dates.

## Test results (Please list additional results on a separate sheet)

- ☐ A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	<input type="text"/>		
Date sample taken	<input type="text"/>		
Sampling location <sup>7</sup>	<input type="text"/>		
Test result (PCR): Amount of GMO content per species (e.g. soy, corn...)	<input type="text"/>	<input type="text"/>	%
	<input type="text"/>	<input type="text"/>	%
	<input type="text"/>	<input type="text"/>	%
Test laboratory	<input type="text"/>		

- ☐ No GMO test was conducted

## 3. Measures

What measures have you taken or are planning to take? When were they taken or will be taken?

----------------------

<input type="text"/>	<input type="text"/>	<input type="text"/>
Place	Date	Signature

<sup>5</sup> If not known: Provide the delivery slip number

<sup>6</sup> Unless otherwise contractually agreed

<sup>7</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like

## Explanations for the VLOG Incident Sheet

### - Feed Manufacturing and Logistics Matrix Organiser

*Note: In case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective members. Members are not required to submit separate incident reports in that case.*

#### 1. What are “incidents” within the meaning of the VLOG Standard?

“Incidents” are scenarios in which non-VLOG-compliant feed is placed on the market as “VLOG geprüft” or with the “VLOG geprüft” seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of feed manufacturing and logistics:

- GMO feed subject to compulsory labelling under EU Regulations 1829/2003 and 1830/2003<sup>1</sup> was marketed as “VLOG geprüft”<sup>2</sup>
- Feed containing GMOs that are not approved in the EU was marketed as “VLOG geprüft”<sup>3</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business’s VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

The matrix organiser must notify VLOG about any incidents. The matrix organiser assumes (pooled) reporting responsibility for the respective matrix members. All cases should be reported, even if the organiser is uncertain whether a situation represents an incident or not.

If the matrix organiser does not report the incident, each business must fill out its own *Feed Manufacturer and Logistics Incident Sheet*.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

**As a general rule, the sooner a case is reported the better, even if the information is still incomplete.**

#### 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

---

<sup>1</sup> Under those regulations, the GMO content of the feed components may not exceed 0.9%. Values between 0.1% and 0.9% are only permissible if they are accidental or technically unavoidable.

<sup>2</sup> [Guideline on handling mislabelled GMO feed](#)

<sup>3</sup> The quantity of non-approved GMOs in the feed is irrelevant.

Sign and submit to VLOG e.V.:

Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents:

VLOG Head Office: +49 (0)30 2359 945 00

Outside of business hours: +49 (0)30 2359 945 09

## 1. Information regarding the matrix organisation

Name of matrix organisation		
Activity area of VLOG matrix	<input type="checkbox"/> Logistics Stage <input type="checkbox"/> (Drop) shipping <input type="checkbox"/> Storage/handling <input type="checkbox"/> Transport <input type="checkbox"/> Feed Manufacturing Stage <input type="checkbox"/> Manufacturing/Processing <input type="checkbox"/> Grinding and mixing facility	
Address of matrix organisation	Street address	
	Postal code, city	
	Country	
VLOG ID		
Emergency contact person for VLOG	Name	
	Telephone number	
	Email/Fax	
VLOG certification body	Name	
	<input type="checkbox"/> The certification body has already been informed of the incident → If this is not the case, please do so immediately	
Matrix sites/members affected by the incident		
<input type="checkbox"/> (more) see annex		

## 2. Information regarding the incident

## Type of incident

☐ Positive GMO test result for a feed sample☐ Error/commingling in the business (e.g. feed in the wrong silo)☐ Error/commingling in another business:☐ Other:

Brief description of the incident (What happened? What is the (possible) cause?)

--

When was the incident first noticed (by you or the matrix site?)

How did you learn of the incident?

--

## Feed affected by the incident (please list additional feed on a separate sheet)

☐ Feed from own production – date of manufacture:

☐ Feed purchased from a supplier:

Address:

Contact person:

Delivery date:

Number of delivery slip:

☐ Feed in contract manufacturing for:

Address:

Contact person:

Unique name of the feed (commercial name)	<input type="text"/>
Type of feed	<input type="checkbox"/> Single-component feed <input type="checkbox"/> Compound feed <input type="checkbox"/> Other: <input type="text"/>
Batch number <sup>4</sup>	<input type="text"/>
Total quantity affected	<input type="text"/>
- thereof already placed on the market	<input type="text"/>
Marketing period	<input type="text"/> <input type="text"/>

☐ Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing <sup>5</sup>

☐ A list of affected customers is attached. The list includes quantities and delivery dates.

## Test results (Please list additional results on a separate sheet)

☐ A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	<input type="text"/>		
Date sample taken	<input type="text"/>		
Sampling location <sup>6</sup>	<input type="text"/>		
Test result (PCR):	<input type="text"/>	<input type="text"/>	%
Amount of GMO content per species (e.g. soy, maize/corn...)	<input type="text"/>	<input type="text"/>	%
	<input type="text"/>	<input type="text"/>	%
Test laboratory	<input type="text"/>		

☐ No GMO test was conducted

## 3. Measures

What measures have you taken or are you planning to take? When were they taken or will be taken?

<input type="text"/>
----------------------

<input type="text"/>	<input type="text"/>	<input type="text"/>
Place	Date	Signature

<sup>4</sup> If not known: Provide the delivery slip number

<sup>5</sup> Unless otherwise contractually agreed

<sup>6</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like

## Explanations for the VLOG Incident Sheet

### - Agriculture and Livestock Trade Stages

*Note: For VLOG group certifications, the group organiser can assume (pooled) reporting responsibility for group members (cf. VLOG Incident Sheet for Agricultural Group Organiser). Farmers are not required to submit separate incident reports.*

#### 1. What are “incidents” within the meaning of the VLOG Standard?

“Incidents” are scenarios in which non-VLOG-compliant animals or food is placed on the market with the “Ohne GenTechnik” seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of agriculture and livestock trade:

- Animals/animal products were marketed as “VLOG” or with the “Ohne GenTechnik” seal, although they do not meet the requirements of the VLOG Standard (e.g. required minimum feeding conversion period was not (yet) met by the time of sale; GMO feed subject to compulsory labelling was fed, so that the minimum feeding conversion period had to be started over)<sup>1</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business’s VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

The certified business must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG.

In this case, each business has to fill out a separate incident sheet. If the group organiser reports the incident for group certifications, individual group members are not required to report it separately. One incident sheet can be used for multiple locations of a single business.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

**As a general rule, the sooner a case is reported the better, even if the information is still incomplete.**

#### 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incidents and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

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<sup>1</sup> [Guideline on handling mislabelled GMO feed](#)

Sign and submit to VLOG e.V.:

Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents:

VLOG Head Office: +49 (0)30 2359 945 00

Outside of business hours: +49 (0)30 2359 945 09

## 1. Information regarding the business

Name of business		
Business activity area	<input type="checkbox"/> Agriculture <input type="checkbox"/> Animal production: <input type="text"/> <input type="checkbox"/> Plant-based feed production for own facility <input type="checkbox"/> Livestock transport/livestock trade	
	<input type="checkbox"/> Business is part of a VLOG group certification	
	Street address	
	Postal code, city	
Business address	Country	
	VLOG ID (or the name of the organiser <sup>2</sup> )	
Emergency contact person for VLOG	Name	
	Telephone number	
	Email/Fax	
VLOG certification body	Name	
	<input type="checkbox"/> The certification body has already been informed of the incident → If this is not the case, please do so immediately	
Business locations affected by the incident (including Sub ID, if any):		

## 2. Information regarding the incident

## Type of incident

- ☐ Feed containing GMOs was fed to VLOG animals, so that the minimum feeding conversion period must restart
- ☐ Animals/products were marketed as "VLOG" although the requirements of the VLOG Standard were not met (e.g. minimum feeding conversion period not met)
- ☐ Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you become aware of the incident?

How did you learn of the incident?

<sup>2</sup> Businesses that are part of a group certification do not have their own VLOG IDs. Enter the name or VLOG ID of the business that represents the business as group organiser.

## Feed affected by the incident (please list additional feed on a separate sheet)

- ☐ Feed from own production
- ☐ Compound feed from mobile/jointly used or stationary/business-owned grind and mixing facility
- ☐ Feed purchased from a supplier:
- Address:
- Contact person:
- Delivery date:

Feed name (commercial name)	<input type="text"/>		
Type of feed	<input type="checkbox"/> Single-component feed	<input type="checkbox"/> Compound feed	<input type="checkbox"/> Other: <input type="text"/>
Total quantity affected	<input type="text"/>		
Batch number <sup>3</sup>	<input type="text"/>		
- Amount already fed to animals	<input type="text"/>		
Feeding period	<input type="text"/>	to	<input type="text"/>

## Which animals and products were affected by the incident? (animal type/number/barn/product amounts)

<input type="text"/>
----------------------

## Test result (Please list additional results on a separate sheet)

- ☐ A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	<input type="text"/>		
Date sample taken	<input type="text"/>	<input type="text"/>	
Sampling location <sup>4</sup>	<input type="text"/>		
Test result (PCR):	<input type="text"/>	<input type="text"/>	%
Amount of GMO content per species (e.g. soy, maize/corn...)	<input type="text"/>	<input type="text"/>	%
	<input type="text"/>	<input type="text"/>	%
Test laboratory	<input type="text"/>		

- ☐ No GMO test was conducted

## 3. Measures

- ☐ Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>5</sup>
- ☐ A list of affected customers is attached. The list includes quantities and delivery dates.

What measures have you taken or are you planning to take? When were they taken or will be taken?

<input type="text"/>
----------------------

Place

Date

Signature

<sup>3</sup> If not known: Provide the delivery slip number

<sup>4</sup> E.g. at delivery of feed, test completed by supplier, or other

<sup>5</sup> Unless otherwise contractually agreed



# Explanations for the VLOG Incident Sheet

## - Agricultural Group Organiser

*Note: In case of a VLOG group certification, the group organiser can assume (pooled) reporting responsibility for the respective group members, using the Agricultural Group Organiser Incident Sheet.*

### 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant animals or food is placed on the market with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of agriculture:

- Animals/animal products were marketed as "VLOG" or with the "Ohne GenTechnik" seal, although they do not meet the requirements of the VLOG Standard (e.g. required minimum feeding conversion period was not (yet) met by the time of sale; GMO feed subject to compulsory labelling was fed, so that the minimum feeding conversion period had to be started over)<sup>1</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

### 2. How should incidents be reported to VLOG?

The VLOG group organiser must notify VLOG about any incidents. In doing so, the group organiser assumes (pooled) reporting responsibility for the respective group members. All cases should be reported, even if the group organiser is uncertain whether a situation represents an incident or not.

If the group organiser does not report the incident, each business must fill out its own *Agricultural and Livestock Trade Incident Sheet*.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

**As a general rule, the sooner a case is reported to VLOG the better, even if the information is still incomplete.**

### 3. Who can I contact if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

---

<sup>1</sup> [Guideline on handling mislabelled GMO feed](#)

Sign and submit to VLOG e.V.:

Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents:

VLOG Head Office: +49 (0)30 2359 945 00

Outside of business hours: +49 (0)30 2359 945 09

## 1. Information regarding the group organiser

Name of business		
Business address	Street address	
	Postal code, city	
	Country	
VLOG ID		
Emergency contact person for VLOG	Name	
	Telephone number	
	Email/Fax	
VLOG certification body	Name	
	<input type="checkbox"/> The certification body has already been informed of the incident → If this is not the case, please do so immediately	
Group members affected by the incident:		
<input type="checkbox"/> (more) see annex		

## 2. Information regarding the incident

## Type of incident

☐ Feed containing GMOs was fed to VLOG animals, so that the minimum feeding conversion period must restart

☐ Animals/products were marketed as "VLOG" although the requirements of the VLOG Standard were not met (e.g. minimum feeding conversion period, accidental swapping of animals/products)

☐ Other: 

Brief description of the incident (What happened? What is the (possible) cause?)

When was the incident noticed (by you and/or the group member)?

How did you learn of the incident?

## Feed affected by the incident (please list additional feed on a separate sheet)

☐ Feed from own production  
☐ Compound feed from mobile/jointly used or stationary/business-owned mixing and grinding facility  
☐ Feed purchased from a supplier:   
 Address:   
 Contact person:   
 Delivery date:

Feed name (commercial name)	<input type="text"/>		
Type of feed	<input type="checkbox"/> Feed material	<input type="checkbox"/> Compound feed	<input type="checkbox"/> Other: <input type="text"/>
Total quantity affected	<input type="text"/>		
Batch number <sup>2</sup>	<input type="text"/>		
- Amount already fed to animals	<input type="text"/>		
Feeding period	<input type="text"/>	to	<input type="text"/>

## Which animals and products were affected by the incident? (animal type/number/barn/product amounts)

## Test result (Please list additional results on a separate sheet)

☐ A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	<input type="text"/>		
Date sample taken	<input type="text"/>		
Sampling location <sup>3</sup>	<input type="text"/>		
Test result (PCR):	<input type="text"/>	<input type="text"/>	%
Amount of GMO content per species (e.g. soy, maize/corn...)	<input type="text"/>	<input type="text"/>	%
	<input type="text"/>	<input type="text"/>	%
Test laboratory	<input type="text"/>		

☐ No GMO test was conducted

## 3. Measures

☐ Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>4</sup>  
☐ A list of affected customers is attached. The list includes quantities and delivery dates.

What measures have you taken or are you planning to take? When were they taken or will be taken?



Place

Date

Signature

<sup>2</sup> If not available: Provide the delivery slip number

<sup>3</sup> E.g. at delivery of feed, test completed by supplier, or other

<sup>4</sup> Unless otherwise contractually agreed

## Explanations for the VLOG Incident Sheet

- Food Processing and Logistics Stages and Retail Group Certification (sale of bulk food of animal origin)

### 1. What are “incidents” within the meaning of the VLOG Standard?

“Incidents” are scenarios in which non-VLOG-compliant food is placed on the market as “VLOG” or with the “Ohne GenTechnik” seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of food processing and logistics as well as retail:

- Food that does not meet the requirements of the EC Genetic Engineering Implementation Act<sup>1</sup> was marketed as “VLOG” or with the “Ohne GenTechnik” seal
- Food containing GMOs that are not approved in the EU was marketed as “VLOG” or with the “Ohne GenTechnik” seal<sup>2</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business’s VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

### 2. How should incidents be reported to VLOG?

Certified businesses must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG.

In this case, each business has to fill out a separate incident sheet, but one incident sheet can be used for multiple locations of a single business.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

**As a general rule, the sooner a case is reported the better, even if the information is still incomplete.**

### 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

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<sup>1</sup> This includes, among others, any food that is subject to compulsory labeling as GMO pursuant to EU regulations 1829/2003 and 1830/2003; food with a GMO content > 0,1% and any products of animal origin in which the statutory minimum feeding period was not complied with.

<sup>2</sup> The quantity of non-approved GMOs in the food is irrelevant.

# VLOG Incident Sheet

## Food Processing, Logistics and Retail (sale of bulk food of animal origin)

Sign and submit to VLOG e.V.:

Email: [ereignisfall@ohnegentechnik.org](mailto:ereignisfall@ohnegentechnik.org)

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents: VLOG

Head Office: +49 (0)30 2359 945 00

Outside of business hours: +49 (0)30 2359 945 09

### 1. Information regarding the business/retail group organiser

Name of business		
Business activity area	<input type="checkbox"/> Logistics Stage <input type="checkbox"/> (Drop) shipping <input type="checkbox"/> Storage/handling <input type="checkbox"/> Transport <input type="checkbox"/> Food Processing/Preparation Stage <input type="checkbox"/> Retail Stage – Sale of Bulk Food of Animal Origin	
Business address	Street address	
	Postal code, city	
	Country	
VLOG ID <sup>3</sup>		
Emergency contact person for VLOG	Name	
	Telephone number	
	Email/Fax	
VLOG certification body	Name	
	<input type="checkbox"/> The certification body has already been informed of the incident → If this is not the case, please do so immediately	
Business locations affected by the incident (including Sub ID or employee, if any):		

### 2. Information regarding the incident

#### Type of incident

- ☐ Positive GMO test result for raw material/food  
☐ Error/commingling within the business (e.g. non-compliant raw materials in "VLOG" products)  
☐ Error/commingling in another business:   
☐ Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you learn of the incident?

How did you learn of the incident?

<sup>3</sup> Businesses that are part of a matrix or group certification do not have their own VLOG IDs. Enter the name or the VLOG ID of the business that represents the business as matrix/group organiser.

## Product affected by the incident (please list additional products on a separate sheet)

☐ Product from own production – date of manufacture:

☐ Purchased product or raw materials purchased from a supplier:

Address:

Contact person:

Delivery date:

☐ Product in contract manufacturing for:

Address:

Contact person:

Unique name of the product (commercial name)	<input type="text"/>		
Item description according to specification	<input type="text"/>		
Batch number <sup>4</sup>	<input type="text"/>		
Total quantity affected	<input type="text"/>		
- thereof already placed on the market	<input type="text"/>		
Marketing period	<input type="text"/>	to	<input type="text"/>

☐ Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>5</sup>

☐ A list of affected customers is attached. The list includes quantities and delivery dates.

## Test result (Please list additional results on a separate sheet)

☐ A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	<input type="text"/>		
Date sample taken	<input type="text"/>	<input type="text"/>	
Sampling location <sup>6</sup>	<input type="text"/>		
Test result (PCR):	<input type="text"/>	<input type="text"/>	%
Amount of GMO content per species (e.g. soy, maize/corn...)	<input type="text"/>	<input type="text"/>	%
	<input type="text"/>	<input type="text"/>	%
Test laboratory	<input type="text"/>		

☐ No GMO test was conducted

## 3. Other information

What measures have you taken or are you planning to take? When were they taken or will be taken?

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<input type="text"/>	<input type="text"/>	<input type="text"/>
Place	Date	Signature

<sup>4</sup> If not known: Provide the delivery slip number

<sup>5</sup> Unless otherwise contractually agreed

<sup>6</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like