

"Ohne Gentechnik" Production and Certification Standard

Part A - General

Version 23.01

Published on 1 September 2022 Obligatory as of 1 January 2023



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Part A: General

A 1 Preamble

The VLOG "Ohne Gentechnik" Production and Certification Standard consists of several parts. Part A of the VLOG Standard, the General Part, describes the structure of the VLOG Standard, the principal legal basis for "Ohne Gentechnik" labelling as well as the VLOG auditing system. The use of the "VLOG geprüft" and "Ohne GenTechnik" seals is also explained.

A 2 Introduction

The German EC Genetic Engineering Implementation Act (EGGenTDurchfG) has been in force since May 2008 which is the legal basis for the "Ohne Gentechnik" label. 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 3 VLOG as Standard-Issuing Body

In 2010, a working group of interested companies formally established the German Association Food without Genetic Engineering (VLOG) from among its members. VLOG offers a platform for the exchange of information, knowledge and experience in connection with the manufacture and marketing of "Ohne Gentechnik" food and represents the interests of its members.

A 4 Purpose

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. The cross-stage certification obligation and the traceability requirement safeguard the entire production chain from "VLOG geprüft" feed manufacturing through "VLOG" food-processing.

A certification according to this Standard serves as the basis for issuance by VLOG of a licence to use the "Ohne GenTechnik" and "VLOG geprüft" seals.

A 5 Scope of Application

The present Standard forms the basis for certification for the stages mentioned in A 6 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 approval by VLOG. The VLOG Standard has been drafted in the German language and translated into English. If there are discrepancies between the translation and the German version, the German original shall prevail.

A 6 Structure

The VLOG Standard is divided into several parts (A-H and Z). The stages and sub-stages in the production chain for which the VLOG Standard lays down requirements are defined in Figure A 1. The figure also explains which parts apply to the various businesses, activities and services. The regulations regarding the certification obligation may be found at the beginning of the stage-specific Parts B to H of the Standard.

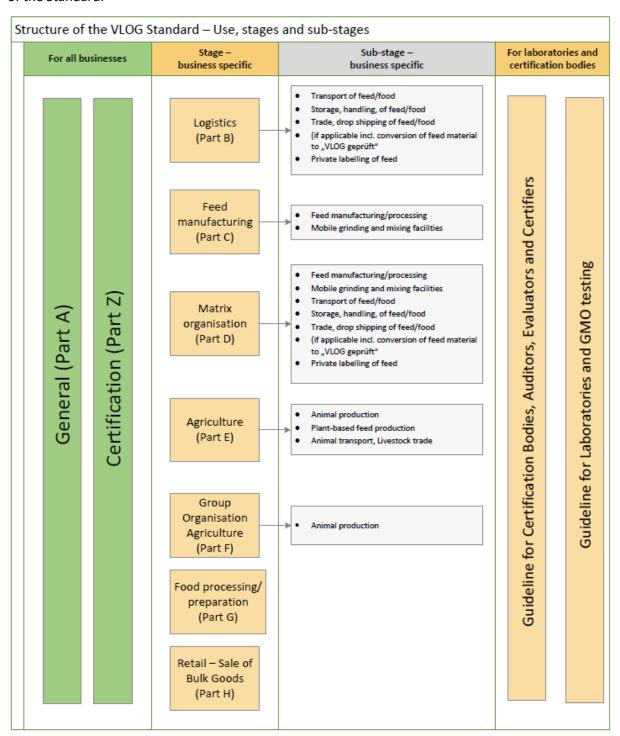


Figure A 1: Structure of the VLOG Standard

A 7 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.

A 8 Legal Basis and Interpretation

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

- Regulations (EC) No. 1829/2003 and 1830/2003
- EC Genetic Engineering Implementation Act (in short: EGGenTDurchfG)
- Guidelines for controlling GMOs in feed, version 3 (as of 15 July 2021): Guidelines for monitoring the production, handling, use and placing on the market of feed in connection with genetically modified organisms (GMO), 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 German Federal Government and the PCR Working Group of the Feed Expert Group of the Association of German Agricultural Investigation and Research Institutions (VDLUFA) (in short: Feed Guideline)
- Statement no. 2016/01: <u>Guidelines for controlling genetic modifications in food products</u> orientation framework for applying the legal regulations and for controlling genetic modifications in food products of 2 October 2019 (developed by the ALS working group Monitoring of GMO Food Products, in short: Food Guideline)
- Additional interpretations of the legal regulations by the VLOG managing office may be found at: https://www.ohnegentechnik.org/en/faq or https://www.ohnegentechnik.org/en/faq or https://www.ohnegentechnik.org/en/faq or https://www.ohnegentechnik.org/en/faq or https://www.ohnegentechnik.org/en/faq or https://www.ohnegentechnik.org/en/download-center

The following legal provisions and interpretations are considered to be requirements and rules with respect to or for the users of the VLOG Standard (VLOG-certified businesses, VLOG-recognised laboratories and certification bodies).

A 8.1 Basic Requirements for Food and Feed

A basic requirement regarding feed and food raw materials for the production of food labelled "ohne Gentechnik" is that they be exempt from labelling as "genetically modified" according to the requirements of Regulations (EC) No. 1829/2003 and No. 1830/2003.

Contamination with GMOs permitted in the EU are exempt from labelling obligations as "genetically modified" according to Art. 12 (2) or Art. 24 (2) Regulation (EC) No. 1829/2003 and Art. 4 (8) as well as Art. 5 (4) Regulation (EC) No. 1830/2003 if the following two requirements are fulfilled:

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

A 8.2 Specific Requirements for Feed

"Adventitious or technically unavoidable"

According to the VLOG Standard, contaminations with admissible GMO content < 0.1 % are generally considered as "adventitious" or "technically unavoidable".

According to the Feed Guideline, the assessment of whether a detected contamination is adventitious or technically unavoidable should always be preceded by a case-by-case examination. The following criteria must be examined depending on the individual case:

- Under Art. 24 (3) of Regulation (EC) No. 1829/2003, the business must verifiably have taken appropriate steps to avoid the presence of GMO components (according to Art. 24 (2) of Regulation (EC) No. 1829/2003). The business bears the burden of proof in this regard.
- A feed business that manufactures, uses or handles both GMO-containing feed and non-GMO feed must spatially or temporally separate the two product lines to avoid contamination. In the case of temporal separation, the entry of GMOs or products made from them must be prevented to the extent possible, e.g., through system purges and/or appropriate cleaning of the system. Proof of the suitability of the measures and their implementation is the responsibility of the business, particularly through self-monitoring.
- In the case of feed deliveries from third countries where there is no comparable labelling system, the business must contractually agree to the requirements, and this must be safeguarded by certificates and self-monitoring.
- If feed in which GMO components cannot be excluded is delivered in relevant quantities, it is reasonable and necessary to ask the supplier whether protective measures were taken to avoid the carryover of GMO components and, if so, which measures.
- When repeated audits of a facility regularly detect GMO components within a certain range below the threshold for labelling, this generally does not justify a conclusion by the feed business that the contamination is adventitious or technically and therefore labelling can be omitted in all cases. A reasonable duty of care within the business's own sphere of responsibility includes, e.g., measures to avoid carryover, checking delivered goods and placing obligations on sub-suppliers.

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 Feed Guideline.

Carryover of GMO material during the production process in a feed plant may not be considered as botanical contamination with the resulting labelling requirements.

Feed in "Ohne Gentechnik" production

Under the EC Genetic Engineering Implementation Act (EGGenTDurchfG), no feed may be used in the "Ohne Gentechnik" production system during defined minimum feeding conversion periods before the raw materials/products are arrived at:

- if the feed is labelled as "genetically modified" under Regulation (EC) No. 1829/2003 or No. 1830/2003 or is subject to a labelling obligation under Regulation (EC) No. 1829/2003 or No. 1830/2003 or
- would have to be labelled if it was placed on the market or
- for which there is no marketing authorisation under Regulation No. 1829/2003.

Feed additives must be taken into consideration for the labelling as "genetically modified" only if

• they are made from GMOs or GMO components and therefore must be labelled as "genetically modified" 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 8.3 Specific Requirements for Food

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.

Under the EC Genetic Engineering Implementation Act (EGGenTDurchfG), ingredients and additives for the production and manufacture of "Ohne Gentechnik" food:

- may not be GMOs
- may not contain GMOs and
- may not be produced from or by 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.

The following applies to processing aids and other substances:

• Production by GMOs is precluded.

A 8.4 Additional Requirements for Processing Aids and other Substances

According to the VLOG Standard, the following additional requirements apply to processing aids and other substances, in addition to statutory principles and interpretations:

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 9 Auditing System

The VLOG auditing system consists of self-monitoring by the business, independent audits by VLOG-recognised certification bodies and audits under the VLOG Integrity Programme.

A 9.1 Self-Monitoring by the Business

VLOG-certified businesses must perform self-monitoring and (review) risk grading based on stage-specific parts (B-H). The basis for this is the creation and review of a facility, matrix or group description.

A 9.2 Independent Audits

VLOG-recognised certification bodies regularly conduct risk-based independent audits of the business to check compliance with stage-specific requirements (Parts B-H). In this regard, the Standard distinguishes between:

- Individual certification
- Matrix certification for logistics and feed manufacturing (for associated businesses/sites in the areas of logistics and feed manufacturing)
- Group certification in agriculture (for associated agricultural businesses)
- Group certification in retail (for associated branch operations)

The rules for independent audits are described in Part Z: Certification.

A 9.3 Integrity Audits

As part of the Integrity Programme to ensure quality and the correct implementation of the VLOG standard, VLOG carries out the following activities:

- verification audits, including sampling, if necessary, of licensees and VLOG-certified businesses (including group or matrix members) and
- certification body audits of certification bodies.

The selection is performed, among others, in a risk-based manner or by reason of suspicious factors. Compliance with Standard requirements is verified as part of onsite inspections of all system participants.

Verification audits may be performed with and without advance notice.

Apart from ensuring quality and proper implementation of the VLOG Standard, Integrity Audits serve to further develop the VLOG system.

A 10 Labelling, Use of the Seal

Any business that meets the statutory prerequisites of the EGGenTDurchfG 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 (cf. Figure A 2) must be requested from VLOG (cf. Chapter A 10.1).

A 10.1 "Ohne GenTechnik" Seal

Food may be labelled with the uniform "Ohne GenTechnik" seal (cf. Figure A 2). This was initiated by the Federal Ministry of Food and Agriculture (BMEL) and is protected by trademark law. The use of the "Ohne GenTechnik" label for labelling and advertising of food is only permitted upon the approval of VLOG. It is regulated in a licence agreement between the licensee and VLOG. The prerequisite for this agreement is a certification according with the VLOG standard or a standard recognised as equivalent.

VLOG-Standard 23.01 – 01.09.2022



Figure A 2: "Ohne GenTechnik" seal for food

A 10.2 "VLOG geprüft" Seal and Word Mark

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 – binding labelling with the word mark "VLOG geprüft" or, alternatively, with the word/design mark (seal cf. Figure Figure A 3) "VLOG geprüft" is required for VLOG-certified feed (cf. Chap. B 2.8 or C 3.3). The Standard Usage Agreement concluded with VLOG as the holder of trademark rights governs both the use of the word mark and the use of the work/design mark. The specific usage of the word/design mark is governed by a licence agreement between each licensee and VLOG. The basis for this agreement is a certification according with the VLOG Standard or a standard recognised as equivalent.



Figure A 3: "VLOG geprüft" seal for feed

Glossary: Definitions of terms

The following definitions and abbreviations are used for the terms utilised in the VLOG Standard:

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 DIN EN 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: 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.

Calves: Cattle offspring from birth to 6 months old.

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.

Contamination: Generic term for carryover, interchange or mixing

Conventional quality, products and raw materials: Not usable in the "Ohne Gentechnik" process.

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, but has a contractual relationship with the customer and 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 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".

Feed: Substances or products, including additives, be it in processed, partially processed or unprocessed form, which are intended for oral feeding of animals.

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).

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.

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.

- 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.

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 services directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).

Inter-facility use of machinery and equipment: Joint use of transport vehicles, harvesting vehicles or other agricultural machines or equipment by multiple businesses/facilities.

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.

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 with activities at the logistics and/or feed manufacturing stage, which is integrated into a VLOG matrix by contract.

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 (cf. 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": Meeting the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG). For purposes of harmonisation with the requirements of the EGGenTDurchfG, the VLOG Standard uses the standard term "Ohne Gentechnik".

"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: Substances 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" production/marketing. The applicable limit values and conditions of EU Regulations 1829/2003 and 1830/2003 and EGGenTDurchfG must be followed for this classification (cf. Chapter A 8).

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 client's (private labeller) specifications or the goods are purchased from the client and sold in Private Labeller's name.

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.

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).

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/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".

Raw materials: Any and all materials used to produce a food product.

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 contaminations 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 (cf. 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.

Standards recognised as equivalent: Quality standards under which certification has been recognised by VLOG as equivalent to certification under the VLOG "Ohne Gentechnik" Production and Certification Standard. An additional VLOG-certification of the relevant product (food, ingredient, additive, processing aid), animal or feed is not required if it is certified under the recognised standard and any necessary additional requirements have verifiably been met. A list of equivalently recognised standards can be found here:

https://www.ohnegentechnik.org/fileadmin/user_upload/01_unternehmen/e_standards/e1_der_vlog_standard/Further_Documents/Standards_recognised_as_equivalent.pdf

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.

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 physical possession of 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 a business with at least two sites as well as for the joint certification of multiple businesses with their sites.

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 organisation 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.

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

VLOG matrix/matrix organisation: A VLOG matrix or matrix organisation is a combination of different businesses/sites with activities at the logistics and/or feed manufacturing stage (the so-called matrix members) for the purpose of VLOG matrix certification. The logistics and feed manufacturing stages and their respective sub-stages can be combined into a matrix as desired. Matrix organisation is available for businesses with at least two sites as well as for the joint certification of multiple businesses with their sites.

"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.

Young cattle: Cattle offspring aged 7 to 12 months.

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) repealed
- (6) repealed
- (7) Reduction of the Scope of Testing after Changing Feed in Group Organisations

Part 3 Certification

- (8) repealed
- (9) repealed
- (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
- (20a) Facility Description Agriculture
- (20b) Facility Description Agriculture Beekeepers
- (20c) Facility Description Animal Transport/Livestock Trade
- (21) repealed
- (22a) Checklist Agriculture including Beekeepers
- (22b) Checklist 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/Preparation, Logistics and Retail

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.

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