



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

## **Part C - Feed Manufacturing**

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## Part C: Feed Manufacturing

This part of the Standard describes the requirements for the Feed Manufacturing Stage and its sub-stages. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

### C 1 Stage Definition and Mandatory Certification

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 Part C.			
All types of feed	For bulk and/or bagged/packaged feed, produced in the business, that intended to be advertised/labelled as “VLOG geprüft”*.	For bulk and/or bagged/packaged feed, produced in the business that is <u>not</u> intended to be advertised/labelled as “VLOG geprüft”.	C 1 - C 3
<b>Sub-stage Mobile grinding and mixing facility:</b> Commercial, multi-operation production of feed using mobile equipment in agricultural businesses.			
Grinding/mixing of feed	For the grinding and/or mixing of feed that is to be advertised/labelled 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 the grinding and/or mixing of feed that is <u>not</u> to be advertised/labelled as “VLOG mixture”.	C 1- C 2, C 4
<b>Transport, storage and handling as a service, trading and drop shipping (including conversion of feed, if any) as well as Private Labelling of feed are at the Logistics stage (Part B).</b>			

Table C 1: Stage definition and mandatory certification

\* (Word mark or seal according to chapter A 10)

## C 2 General Requirements

### C 2.1 Standard Usage Agreement with VLOG

For individually certified businesses there is a Standard Usage Agreement with VLOG signed by both parties, including the VLOG ID (10-xxxxx) issued by VLOG. There is a VLOG sub-ID (10-xxxxx-A/B, etc.) issued by VLOG for all sites included in the VLOG-certification.

### C 2.2 Facility Description

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

The certification body or the matrix organiser are promptly informed about major changes pertaining to VLOG certification.

**i** *Explanation: Information transmitted 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 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/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 VLOG certification are, e.g., change of 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 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 2.3 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.*

### C 2.4 Risk Management (KO)

#### Risk analysis

A documented risk analysis has been created 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 (e.g., countries of origin)
- incl. risk grading of feed (risk-prone/not risk-prone)

- 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 and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary



Explanation: An “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).

### **Risk management**

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

## **C 2.5 Commissioning External Service Providers**

External service providers may be commissioned for activities requiring certification in the areas of Feed Manufacturing, Transport, Storage or Handling (cf. Part B 1 Logistics, C 1 Feed Manufacturing) under one of the following conditions:

- the external service provider is audited by the certification body in the course of the VLOG on-site audit of the client or
- the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent.

### **Auditing in the course of the VLOG Audit of the Client**

If the external service provider is audited in the course of the VLOG audit of the client, the following requirements must be met:

- A contractual agreement between the client and contractor stating the details of the outsourced activity, its scope as well as the contractor's obligation to comply with the current VLOG Standard.
- The activity is included under the client's risk-management programme (cf. Chapter C 2.4).

### **If the External Service Provider is certified**

If the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent, the following requirements must be met:

- The VLOG certification of the external service provider is to be checked periodically, the minimum being once per calendar year.
- The activity is included under the client's risk-management programme (cf. Chapter C 2.4)

## **C 2.6 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 A 10). 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**

There must exist a confirmation from the supplier that all feed, feed additives and processing aids classified by the business as risk-prone (cf. Chapter C 2.4) are GMO-free or exempt from labelling. 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 (cf. Chapter C 2.4), the respective delivery slip for the feed need not be labelled under Regulation (EC) Nos. 1829/2003 and 1830/2003.

## **C 2.7 Segregation of Goods Flows, Exclusion of Contaminations (KO)**

The physical and/or temporal separation of goods flows must ensure that at no time feed that is not suitable for “VLOG geprüft” labelling 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 contamination by 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 2.8 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:

- Clarification of whether an incident has occurred (cf. Chapter C 2.12)
- 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.

Feed test results are to be evaluated in accordance with Chapter C 3.1.4.



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

## C 2.9 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed existing in the business/at the 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 the plausibility of the goods flows.



*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 2.10 Complaint Management

A documented system must be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These 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 2.11 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 2.12 Crisis Management (KO)



*Explanation: Incidents are defined on the incident sheet (cf. Annex (31)).*

A current, 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
- Provisions requiring immediate notification of
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (31))
  - the VLOG Head Office using the VLOG Incident Sheet (see Annex (31))
- 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 2.13 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 corrective actions must be implemented in due time, and their effectiveness must be checked within a reasonable period of time. Both are to be documented.

### C 2.14 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 or labelling with the “VLOG geprüft” seal 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. In accordance with the Guideline for Monitoring GMOs in Feed, feed- (regarding GMO) related documents must be retained for five years.*

### C 2.15 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 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” 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 2.16 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.

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 3 Specific Requirements for Feed Manufacturing/Processing

### C 3.1 Sampling and Testing

Risk-based sampling and GMO testing is to be performed according to Chapter C 2.4 for the manufacture or labelling of relevant “VLOG geprüft” feed in accordance with the following specifications.

#### C 3.1.1 Sampling and Testing Plan

A written sampling and testing plan on the basis of the business-specific risk grading (cf. Chapter C 2.4) for feed in “VLOG geprüft” manufacturing is to be on file that describes the sampling and testing procedure and that is implemented according to schedule.

The sampling and testing plan, in compliance with the requirements listed in Chapter C 3.1.2 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
- Description of the test procedure (commissioned laboratory, scope of testing cf. [Guideline for Laboratories](#))

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 which feed does not need to be sampled/analysed.



*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 3.1.2 Sampling and Commissioning a laboratory

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

- Feed: min. 400 g, max. 1 kg
- Feed material/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)

**i** *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.*

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

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

The client for the GMO testing must 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 flour, soy as soy extraction meal). Copies of the composition/declarations are to be sent to the laboratory along with the samples.

**i** *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.*

### C 3.1.3 Frequency of Sampling and Testing

Each calendar year, the frequency of sampling and testing in the business must at least follow the specifications listed in Table C 2.

All samples to be tested must be quickly sent to a VLOG-recognised laboratory. Second or third tests from a single sample are generally permissible but the tests must be performed immediately (express testing).

Area	Sampling + testing at “VLOG geprüft” incoming goods (raw materials)	Minimum sampling + testing in “VLOG geprüft” outgoing goods inspection <sup>1</sup> per calendar year
<b>Production at site</b>		
<b>Entire production not subject to compulsory labelling</b>	For every batch of risk-prone feed material	up to, including 10,000 t/year: 1 > 10,000 to 50,000 t/year: 2 > 50,000 to 100,000 t/year: 4 > 100,000 to 200,000 t/year: 6 > 200,000 to 300,000 t/year: 8 for every additional 100,000 t or part thereof: 2 additional

<sup>1</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

<b>Dual production</b>	For every batch of risk-prone feed material	up to, including 2,000 t/year: 1 > 2,000 to 5,000 t/year: 3 > 5,000 to 10,000 t/ year: 5 > 10,000 to 50,000 t/year: 10 > 50,000 to 100,000 t/year: 15 > 100,000 to 200,000 t/year: 20 > 200,000 to 300,000 t/year: 25 for every additional 100,000 t or part thereof: 5 additional
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Table C 2: Minimum sampling + testing at the Feed Manufacturing Sub-stage per calendar year<sup>2</sup>

### C 3.1.4 Evaluation of Test Results

Test results are to be evaluated in accordance with the following requirements. (Corrective) measures shall be derived from the results, if necessary, and implemented.

If there are two different test results from one sampling, the following procedure shall be used to reach the final result:

- If the test results, including expanded measurement uncertainty, overlap, the mean value shall be calculated from the test results.
- If the test results, including expanded measurement uncertainty, do not overlap, a third test of the lot shall be commissioned.

Grading		Actions
<b>GMO not verifiable or &lt; 0.1%</b>		
Labelling compliant, permissible for VLOG-production		No action needed
<b>≥ 0.1 % ≤ 0.9 % GMO</b>		
Case-by-case evaluation	Can the GMO contamination be traced back to your own production system? (e.g., dual production)	<u>Yes</u> : Check whether the actions taken (cf. Chapter C 2.4) are adequate and properly implemented. -If not, take further action in accordance with Chapters C 2.8 and C 2.12  <u>No</u> : Inform suppliers.
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	<u>Yes</u> : The actions taken (cf. Chapter C 2.4) are not adequate and must be revised.  <u>No</u> : (No systemic cause): No action needed.

<sup>2</sup> All feed quantities relate exclusively to feed that is either intended to be used in “VLOG geprüft” production and/or is be labelled as “VLOG geprüft”, depending on the respective facility.

<b>&gt; 0.9 % GMOS</b>	
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in Chapters C 2.8 and C 2.12

Table C 3: Evaluation of Test Results feed

## C 3.2 Reference Samples

The business shall retain complete reference samples of all outgoing “VLOG geprüft” batches in suitable containers so it can draw conclusions as to the actual quality delivered, 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 to both bulk feed and packaged feed.*

## C 3.3 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 (cf. Chapter A 10). It must be clearly evident to which feed item the labelling refers.



*Explanation: 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 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 4 Specific Requirements for Mobile Grinding and Mixing Facilities

### C 4.1 Specific Measures to Eliminate Contaminations

According to Chapter C 2.7 measures must be defined, documented and implemented for each facility to prevent the carryover of GMO feed from previous mixtures during the production of “VLOG mixtures”. Other risk factors such as the age of the facilities and repairs will be taken into account.

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

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

- at least one complete discharge and/or system purge must be performed following mixtures subject to compulsory labelling and before use in VLOG production – depending on the type of facility and internal risk assessment.

- Regardless of the operator's risk assessment, a system purge must always be performed if more than 40 % of the previous mixture consisted of feed subject to compulsory labelling (based on total mixture weight). This is also required if a complete discharge has already been performed.
- the system purge must be performed in accordance with the manufacturer's instructions and with a sufficiently large quantity. It must be reasonably evident to the auditor that the batch size was adequate (e.g., using the manufacturer's information regarding carryover or the operator's own test results).
- the system purges must be used outside of VLOG production.
- The method of complete discharges and/or system purges must be clearly documented.
- the performance of the complete discharge and system purge must be documented in the mixing protocol in accordance with Chapter C 4.3 /Annex (30).

## C 4.2 Safeguarding with a Carryover Test



*Explanation: It is not necessary to conduct carryover tests if the only feed ground/mixed in grinding and/or mixing facilities is feed not subject to mandatory labelling.*

If feeds (including oils) subject to mandatory labelling are also ground/mixed, the operator of the grinding and/or mixing facility must conduct a carryover test for all identical models used, in order to validate the effectiveness of the measures taken to prevent 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 results of the carryover test conducted are to be documented and retained at least until the next test. The business must derive appropriate measures from the results, if necessary.

### **Carryover Test upon Entry into VLOG Production:**

A carryover test must be conducted. It can only be omitted in the following cases:

- Facility with a complete discharge:
  - Performance of a complete discharge and a system purge in accordance with the manufacturer's instructions (or based on the business' own test results) after every mixing involving feed subject to mandatory labelling and before any "VLOG mixing".
- Brand new facility:
  - Presenting 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.).

### **Carryover Tests in Subsequent Years:**

- at least every five calendar years
- when there are material changes to the facility (repairs, wear and tear, defects...), which can affect the carryover.

## C 4.3 Mixing Documentation and Mixing Protocols

The mixing sequence and the individual mixtures per facility are to be documented on a daily basis in chronological order. 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 4.4 Sampling**

### **C 4.4.1 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 permission authorises the operator of the mobile grinding and mixing facility to sample the manufactured “VLOG mixture”.

## **C 4.5 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”.