



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

## **Part F - Group Organisation Agriculture**

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## Part F: Group Organisation Agriculture

The following part of the Standard describes the requirements for the group organisation agriculture, which is certified as part of group certification agriculture. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

### F 1 Stage Definition and Mandatory Certification

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.

	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 a VLOG group organisation agriculture, certification is done through the group organiser, i.e. the group organiser receives the certification for the VLOG agricultural group.			
	For primary production of food of animal origin	For the production of plant-based raw materials (food).	F 1-F 2
<b>Agricultural group member, hereinafter group member:</b> Agricultural operation/site which is contractually integrated into a VLOG agricultural group. <ul style="list-style-type: none"> <li>• 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)).</li> <li>• 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).</li> <li>• If a business is a member of a VLOG group, individual certification according to the VLOG Standard is not permissible for the same area of applicability.</li> </ul>			
	For the production and processing of food of animal origin.	For the production of plant-based food.	E1-E5

Table F 1: Stage Definition and Mandatory Certificati

## **F 2 Requirements for Group Organisers**

### **F 2.1 Standard Usage Agreement with VLOG**

There is a Standard Usage Agreement between the group organiser and VLOG signed by both parties, including the VLOG ID (10-xxxxx) issued by VLOG.

### **F 2.2 Group Description, Members List, Stable Space Overview and Facility Description**

#### **F 2.2.1 Group Description (see Annex (23))**

The group organiser must submit a current group description to the certification body. 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 outsourced processes (e.g. external service providers) 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 organisation 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)
- If applicable, if multiple certification bodies have been engaged, 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)

#### **F 2.2.2 Members list (see Annex (23a)/(23b))**

A complete members list in accordance with Annex (23a) or, for laying hens, Annex (23b) is to be on file and up to date.

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>1</sup> during the period between 01 January and 31 March of every calendar (only the data in the area labelled "Data transfer 1x per calendar year to VLOG").

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

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<sup>1</sup> Or a compatible format coordinated with VLOG

### F 2.2.3 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 (23c) 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.

### F 2.2.4 Facility Description (see. Annex (20a)/(20b)/(20c))

The group organiser is responsible for the facility descriptions of the group members and for keeping them up to date. Updated facility descriptions must be available at the facilities of group members. The group organiser must promptly notify certification body of internal changes in the business pertaining to the certification.



*Explanation: 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.*



*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 2.3 Contractual Binding of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract or participation statement. The contract must contain at least the following items:

- Compliance with the VLOG Standard
- Implementation of the established corrective actions by the member within the established time periods

### F 2.3.1 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.



*Explanation: With the data release statement, the laying facility permits the disclosure of data regarding VLOG-certified print numbers to VLOG.*

## F 2.4 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 and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

### **Risk management**

Preventive, monitoring and control actions must be introduced, implemented and reviewed for efficacy regarding 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 2.5 Commissioning External Service Providers**

External service providers may be commissioned for activities requiring certification in the areas of production, transport, storage, handling and/or (drop) shipping (cf. Chapter B 1 Logistics, E 1 Agriculture, G 1 Food Processing/-Preparation), 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 F 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 system (cf. Chapter F 2.4).

## F 2.6 Sampling and Testing

### F 2.6.1 Sampling and Testing Plan

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

The sampling and testing plan, in compliance with the requirements listed in Chapter F 2.6.2, must at a minimum contain/define the following:

- Determination of the risk-prone feed to be sampled/tested based on the risk analysis carried out (cf. Chapter F 2.4).
- 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
- Description of the testing procedure (commissioned laboratory, scope of testing cf. [Guideline for Laboratories](#)).



*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 cannot be tested for genetic engineering for technical reasons.



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

### F 2.6.2 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)



*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.*



*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 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).

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.



*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.*

### F 2.6.3 Frequency of Sampling and Testing

At least the samplings and tests required by Chapter E 4.11 must be conducted for each agricultural group member within the respective audit interval.

### F 2.6.4 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 or change of feed)	<u>Yes</u> : Check whether the actions taken (cf. Chapter F 2.4/E 3.4) are adequate and properly implemented.  - If not, take further action in accordance with Chapters F 2.8 and F 2.10 (or the relevant chapter in Part E)
		<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 F 2.4/E 3.4) are not adequate and must be revised.
		<u>No</u> : (No systemic cause): No action needed.

Grading	Actions
<b>&gt; 0.9 % GMO</b>	
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in Chapters F 2.8 and F 2.10 (or the relevant chapter in Part E)

Table F 2: Evaluation of Test Results

### F 2.6.5 Evaluation of the analytical data

The group organiser:

- collects the test results of the group members, and evaluates these at least once per calendar year. There must exist an evaluation per group member if there is more than one test result.
- defines risk-based measures (e.g. supplier evaluation) for the group members as applicable.

### F 2.6.6 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 to VLOG between 01 January and 31 March of each calendar year.

## F 2.7 Training of Staff and Group Members

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 by the group organiser. 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 VLOG production. Communication of the information is to be documented.



*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 2.8 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. At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter F 2.10)
- 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.

Feed test results are to be evaluated in accordance with Chapter F 2.6.4



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

## **F 2.9 Complaint Management**

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. They shall be evaluated in a suitable 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 2.10 Crisis Management (KO)**



*Explanation: Incidents are defined on the incident sheet (cf. Annex (34)).*

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

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 “Ohne Gentechnik”/“VLOG” 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
- Regulation for the immediate notification of:
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (cf. Annex (34))
  - the VLOG Head Office using the VLOG Incident Sheet (cf. Annex (34))
- 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 2.11 Corrective Action, Ongoing 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 group organiser is responsible for the timely implementation of corrective actions by the group members. Their effectiveness is to be reviewed within a reasonable period. Both are to be documented.

## **F 2.12 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: Five years.



*Explanation: Documents that must be retained are e.g. delivery slips, supplier evaluations, training documents, etc. In accordance with the Guideline for Monitoring GMOs in Feed, feed- (regarding GMO) related documents must be retained for five years.*

## **F 2.13 Internal Audits**

The group organiser must perform at least one internal audit per calendar year, which covers all the requirements under the Standard for the group 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.