“Ohne Gentechnik” Production and Certification Standard

Part G - Food Processing/Preparation

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Part G: Food Processing/Preparation

This part of the Standard describes the requirements for the Food Processing/Preparation Stage. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

G 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 here: https://www.ohnegentechnik.org/SRAE.

	Certification required according to VLOG Standard	**Certification not required according to VLOG Standard**	**Standard requirements**
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, filtrating or a combination of these various processes (Regulation (EC) No. 852/2004).			
Food of animal origin/ingredients	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. For the retail trade, whenever preparation occurs in outlets, and bulk goods of animal origin are to be labelled with the "Ohne GenTechnik" seal (Part H: Retail - Sale of bulk food of animal origin).	No relevant areas	G 1 - G 2, G 4 H 1- H 2
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.	G 1 - G 4

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	For risk-prone plant-based products which are to be labelled as “VLOG” or with the “Ohne GenTechnik” seal and which are produced with plant-based ingredients for which there is a plausible risk of carryover/appearance of unapproved GMO variants (cf. Chapter G 4).		G 1 - G 4
Transport, Storage and Trans-shipment as a service and Food Retailing are at the Logistics stage (cf. Part B).			

Table G 1: Stage Definition and Mandatory Certificatio

G 2 General Requirements

G 2.1 Standard Usage Agreement with VLOG

There is a Standard Usage Agreement 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.

G 2.2 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.

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.

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.

G 2.3 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.

G 2.4 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 EGGenTDurchfG) for the “Ohne Gentechnik”/“VLOG” area (e.g. 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 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.

G 2.5 Commissioning External Service Providers

External service providers may be commissioned for activities requiring certification (cf. Chapter B 1 Logistics, G 1 Food Processing/Preparation) in the areas of food processing/preparation, transport, storage, handling and/or shipping 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 G 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 G 2.4)

G 2.6 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 (cf. Chapter A 8.1, A 8.2 and A 8.4).

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[1].

- The bills of lading are to be checked for the "VLOG" label within the scope of incoming goods inspection.
- 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 or exemption from labelling 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/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.

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."

G 2.7 Segregation of Goods Flows, Exclusion of Contamination (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.

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

[1] 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.

G 2.8 Handling of Non-compliant Raw Materials/Products (KO)

An effective and documented procedure for handling non-compliant raw materials/products must be in place.

At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter G 2.13)
- 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.

Test results are to be evaluated in accordance with Chapter G 3.1.4.

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

G 2.9 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 (cf. Chapter A 10.1). It must be clearly evident to which raw materials/products the labelling refers.

If no delivery slips/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."

G 2.10 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 the plausibility of goods flows.

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 2.11 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 initiated for justified complaints and feedback.

G 2.12 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 2.13 Crisis Management (KO)

Explanation: Incidents are defined on the incident sheet (cf. Annex (35)).

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” 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
- A provision requiring immediate notification of
  - affected business partners and customers
  - the certification body using the Incident Sheet (cf. Annex (35))
  - the VLOG Head Office using the VLOG Incident Sheet (cf. Annex (35))
- 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 2.14 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 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.

G 2.15 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 2.16 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 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 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*.

G 2.17 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 3 Specific Requirements for Plant-Based Raw Materials

G 3.1 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 3.1.1 Sampling and Testing Plan

A written sampling and testing plan must be available 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 G 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 reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing
- Description of the test procedure (commissioned laboratory, scope of testing cf. Guideline for Laboratories)

Sampling and GMO testing are not necessary or can be reduced if the genetic modifications of the raw materials and products used cannot be tested, either for technical reasons or if they are not risk-prone.

In this case, there must be a risk analysis to create a sampling and testing plan that draws conclusions as to which raw materials and products need not be sampled and tested or may be sampled and tested to a reduced extent. This risk analysis must include at least the following criteria for all raw materials/products used in VLOG 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
- Contamination 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*.

G 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:

- 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)
- Honey at least 150 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 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 ingredients, it must be indicated in what form these are contained. 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.

G 3.1.3 Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in table G 2 each calendar year, at minimum.

All samples to be tested must be quickly sent to a VLOG-recognised laboratory.

Based on the risk analysis produced in accordance with Chapter G 3.1.1, 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.

Risk category	Annual Minimum number of samples + tests of "Ohne Gentechnik" incoming goods per calendar year[2]
0	2
1	6
2	12

Table G 2: Minimum number of samples + tests of "Ohne Gentechnik" incoming goods per calendar year

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

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 G 2.
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 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.

Grading	Actions
GMO not verifiable or ≤ limit of detection (generally 0.1% GMO)	
Labelling compliant, permissible for VLOG-production	No action needed
> Limit of detection (generally 0.1% GMO)	
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in Chapters G 2.8 and G 2.13

Table G 3: Evaluation of Test Results

G 4 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 be updated regularly with risk-prone raw materials/ingredients:

https://www.ohnegentechnik.org/risik-prone_ingredients