



“Ohne Gentechnik” Production and Certification Standard

Part Z - Certification

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Part Z: Certification

Z 1 Introduction

The VLOG “Ohne Gentechnik” Production and Certification Standard consists of several parts. This Part Z of the VLOG Standard, Certification, describes the various possibilities of VLOG-certification and the associated processes and includes the resulting requirements for (future) VLOG-certified businesses and VLOG-recognised certification bodies.

The requirements for VLOG-recognised certification bodies and their personnel and the (re-) recognition process are described in the [VLOG Guideline for Certification Bodies, Auditors, Evaluators and Certification Bodies](#).

Z 2 Types of Certification

As regards the VLOG-certification of businesses, the VLOG Standard distinguishes among the following types of certification:

- Individual certification of businesses
- Matrix certification for Logistics and Feed Manufacturing (for associated businesses/sites of the Logistics and/or Feed Manufacturing stages)
- Group certification in agriculture (for associated agricultural businesses/sites)
- Group certification in retail (for associated branch operations)
- Expansion certification in agriculture (to expand an existing VLOG certification of an agricultural business by adding one or more new areas of application or incorporating one or more new areas of application into a VLOG group certification of an agricultural business (e.g., cattle - cow's milk (raw))

The sequences of the different certification processes and the related requirements and rules for businesses and certification bodies are described in the following chapters.

Z 2.1 Individual certification

Under this type of certification, an individual business is certified according to the VLOG Standard. An individual certification is permissible for businesses at the Logistics, Feed Manufacturing, Agriculture and Food Processing/Preparation stages.

It is performed in the following steps:

- Applying to a VLOG-recognised certification body for certification in the desired area(s) of application
- Concluding an Audit Agreement with this certification body and concluding a Standard Usage Agreement with VLOG
- Planning of audits
- Conducting an audit, including audit documentation and possible risk grading of the business, depending on the stage
- Audit evaluation/review by the certification body
- Certification of the business

Z 2.2 Matrix certification for the Logistics and Feed Manufacturing Stages

Combinations of businesses/sites at the Logistics and Feed Manufacturing stages are certified according to the VLOG Standard under this type of certification. The matrix is organised by a matrix organiser, while the participating businesses are referred to as matrix members, and their sites, as matrix sites. The VLOG-certificate is issued to the matrix organiser.

The matrix certification for Logistics and Feed Manufacturing (hereinafter: the “matrix certification”) is performed in the following steps for initial and follow-up certifications.



The described procedure is also to be applied to new matrix sites.

The matrix organiser applies to a VLOG-recognised certification body for certification in the desired area(s) of application.

- The matrix organiser concludes an Audit Agreement with this certification body and concludes a Standard Usage Agreement with VLOG.



Explanation: Only one certification body may be commissioned for the entire matrix organisation. It is not permissible to retain multiple certification bodies for one matrix certification.

- Submission of the matrix description (cf. Chapter D 2.2.1) and determination of the certification procedure (33% or 100% process) by the matrix organiser
- In case of the 33 %-process: initial data collection by the matrix organiser
- Planning of audits
- Conduct of an audit of the matrix organiser and the matrix sites, according to the 33% or 100% process
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result
 - including clearance of the approved sites for the list of sites
- Certification of the VLOG matrix for logistics and feed manufacturing

Z 2.2.1 Initial Certification Based on Initial Data Collection by the Matrix Organiser (33%-process)

The initial certification according to the 33% process is performed in the following steps:

- The certification body must perform an initial audit of the matrix organiser.



Explanation: This audit is generally done before the audits of the sites.

- The matrix organiser performs the initial collection of data from all sites, i.e. on-site self-monitoring on the basis of the VLOG checklists of the respective Logistics and Feed Manufacturing stage, by demonstrably competent personnel. The matrix organiser thereby verifies the information in the site-related facility descriptions. These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.
- The matrix organiser subsequently forwards all facility descriptions and checklists of the initial data collection for each member/site to the certification body.

- The certification body reviews and evaluates the matrix description of the matrix organiser and the site-related facility descriptions of all matrix sites. Information/documents that are missing or must be corrected are to be requested from the matrix organiser.
- Once all information/documents are available, the certification body will review the matrix organiser's results of the initial data collection through own initial audits at:
 - 100% of feed manufacturers (except for mobile grinding and/or mixing facilities)
 - at least 33% of mobile grinding and/or mixing facilities
 - at least 33% of logistic sites
- The certification body compares the results of initial data collection by the matrix organiser with its own audit results, initiates any actions and decides on the certification and the clearance of the sites for inclusion on the list of sites based on its own audit.

The certification body is responsible for ensuring a balanced distribution of the audits of the sites, considering the risk grading of the matrix organiser and e.g. size of the business/site and its organisation, geographic location, supplier, etc. The certification body has the right not to accept the data collected by the matrix organiser and to conduct an audit at more than 33% of the sites. The decision must be justified in a verifiable manner.

The audit intervals for every individual site for the upcoming audit period are to be determined by the certification body.



Explanation: If the 33%-process is selected, each site must be audited by the matrix organiser prior to being accepted (Initial Data Collection).

Without an initial audit by the certification body, a logistics site (resp. mobile grinding and mixing facilities) can only be accepted if this 33% criterion is still met after its acceptance within the respective calendar year. Newly added sites for feed manufacturing (except mobile grinding and mixing facilities) always must be audited by the certification body prior to their acceptance.

Example: If eight logistics sites join the matrix in March, the matrix organiser conducts an initial survey of all, and the certification body conducts an initial audit of at least three. If an additional site joins the matrix in June of the same year (9th site), 33% of the sites in this calendar year are already covered by the three sites audited in March (33% out of 9 = 3). The new site can be included in the matrix after initial data collection without an initial audit by the certification body. If three additional sites are to be added to the matrix in October, one of them would have to be audited by a certification body again (33% out of 12 = 4) after the initial data collection.

Z 2.2.2 Initial Certification on the Basis of 100% Audits by the Certification Body (100%-process)

The initial certification according to the 100% process is performed in the following steps:

- The certification body must perform an initial audit of the matrix organiser.



Explanation: This audit is generally done before the audits of the sites.

- The matrix organiser forwards the facility descriptions for each member/site to the certification body.
- The certification body must perform an initial audit of all matrix members. (There is no initial data collection by the matrix organiser.)
- The decision on certification and the clearance of the sites for inclusion on the list of sites are based on the VLOG audit.

Z 2.3 Agricultural Group Certification

Combinations of agricultural businesses/sites are certified according to the VLOG Standard under this type of certification. The VLOG group is organised by a group organiser, the participating businesses/sites are called group members. The VLOG-certificate is issued to the group organiser.

Group certification in agriculture for the initial and follow-up certification is to be performed in the following steps:



The described process must also be applied to new group members.

- Applying to a VLOG-recognised certification body for certification in the desired area(s) of application
- Concluding an Audit Agreement with this certification body and concluding a Standard Usage Agreement with VLOG
- Submitting the group description (cf. F 2.2.1), including risk grading of the group members and determination of the certification process (25% or 100% process) by the group organiser
- In case of the 25 %-process: initial data collection by the group organiser
- Planning of audits
- Conducting the audit of the group organiser and the group members in accordance with the 25% or the 100% process
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
 - including clearance of the approved group members for the list of members
- Certification of the VLOG agricultural group

Z 2.3.1 Initial Certification Based on Initial Data Collection by the Group Organiser (25%-process)

Initial certification according to the 25% process is performed in the following steps:

- The certification body must perform an initial audit of the group organiser.



This audit is generally done before the audits of the group members.

- The group organiser employs verifiably competent personnel to perform initial data collection from 100% of the group members, i.e., on-site self-monitoring utilising the VLOG checklists for the Agriculture stage (Annex (22a)) or for the livestock trade (Annex (22b)), if appropriate. The group organiser thereby verifies the information in the facility descriptions of the individual group members. These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.
- On the basis of these initial data collections, the group organiser is to perform a risk grading of all group members according to the requirements in Chapter Z 3.3. The group organiser subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories for each group member.
- The certification body reviews and evaluates the group description of the group organiser and the facility descriptions of all group members. Information/documents that are missing or require correction are requested from the group organiser.

- Once all information/documents are complete, the certification body is to verify the results of the initial data collection by the group organiser for at least 25% of the group members by performing its own initial audits.
During the 25% audit, the certification body is responsible for ensuring a balanced distribution of the audits of the group members, taking into account the risk grading of the group organiser and e.g. size of the facility and organisation, geographic location, feed supplier, etc.
- The certification body compares the results of initial data collection by the group organiser with its own audit results, initiates any actions and decides on the certification and the clearance of the sites for inclusion on the list of sites based on its own audit. The certification body has the right not to accept the data collected by the group organiser and to conduct an audit of more than 25% of all group members. The decision must be justified in a verifiable manner.
- The certification body is to verify the grading of the group members into risk categories and will base the audit intervals of each group member on this grading.



Explanation: If 25%-process is selected, each facility must be audited by the group organiser prior to addition (Initial Data Collection).

Without an audit by the certification body, a new member can only be accepted if the 25% requirement is still met after the member's acceptance within the respective calendar year. If this is not the case, a corresponding number of facilities/candidates must be audited by the certification body in order to meet this value.

Example: if ten farms join the group in March, the group organiser arranges an initial data collection for each facility and the certification body performs an initial audit on at least three. If two additional farms (11th and 12th farms) then join in June of the same year, the 25% for this calendar year is already covered by the three farms audited in March (25% of 12 = 3). The two new farms can be included in the group without a certification body audit. If four additional farms were to join the group in October, one of these farms would have to be audited by the certification body (25% of 16 = 4).

Z 2.3.2 Initial Certification on the Basis of 100% Audits by the Certification Body (100%)

The initial certification according to the 100% process is performed in the following steps:

- The certification body must perform an initial audit of the group organiser.



Explanation: This audit is generally done before the audits of the group members.

- The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body must perform an initial audit of all group members.
- A review of the grading of risk categories, clearance of the members for the list of members and the decision on certification is made on the basis of this VLOG audit.

Z 2.3.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body to audit the group members, the following requirements must be met:

- The groups must be organised such that each certification body can independently audit a respective group or its scope of applicability.
- The group description must be submitted to each certification body.
- Each certification body must also audit the group organiser's compliance with the requirements in the determined scope of certification. This verification can also be

accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an on-site audit of the group organiser.

- Only one certification body, in coordination with the other involved certification bodies, will issue a certificate for the entire group.
- A written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is in place.
- The group organiser ensures that all activities necessary for certification are performed.

Z 2.4 Retail Group Certification

Combinations of branches/sites at the Retail stage are certified according to the VLOG Standard under this type of certification. The group is organised by a group organiser, the participating branches/sites are called group members. The VLOG-certificate is issued to the group organiser.

Retail group certification is to be performed in the following steps.



Explanation: The described process must also be applied to new group members.

- Applying to a VLOG-recognised certification body for certification in the desired area(s) of application
- Concluding an Audit Agreement with this certification body and concluding a Standard Usage Agreement with VLOG
- Submitting the group description, including risk grading of the branches (cf. Chapter H 2.2.1) and determination of the certification process (10% or 100% process) by the group organiser
- Planning of audits
- Conducting the audit of the group organiser and the group members (according to the 10% or the 100% process)
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result
 - including clearance of the approved group members for the list of members
- Certification of the VLOG retail group

Z 2.4.1 Initial and Follow-up Certification Retail VLOG Groups

The initial certification and the follow-up certification of VLOG Retail groups are based on the following process:

- The certification body conducts one initial audit or routine audit of the group organiser per calendar year.



Explanation: This audit is generally done before the audits of the group members.

- The certification body shall conduct one initial or routine audit of the following sized samples of group members:
 - 10% of the group members per calendar year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until sale to the customer must be ensured (cf. Chapter H2.12). These audits are announced.

- 10% of the group members per calendar year if “Ohne Gentechnik”/“VLOG” food is centrally purchased and traceability up until the service counter must be ensured (cf. Chapter H 2.12). These audits are unannounced.
- 100% of the group members if the “Ohne Gentechnik”/“VLOG” food may be purchased locally. These audits are announced.

Based on the information provided by the group organiser in the group description (cf. Chapter H 2.2.1) the certification body conducts audits of branches, which may either be announced to the central purchasing department or unannounced. If the audits are announced and the certification body concludes, based on its on-site audit, that traceability can only be ensured up until the service counter, 10% of the audits of branches in subsequent years will be unannounced.



Explanation: If all the audit criteria, incl. original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.

Z 2.4.2 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body to audit the group members, the following requirements must be met:

- The groups must be organised such that each certification body can independently audit a respective group or its scope of applicability.
- The group description must be submitted to each certification body.
- The certification body must also audit the group organiser's compliance with the requirements in the determined scope of applicability. Depending on the area of responsibility, the audits may be conducted on-site at the group organiser or at the group member. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an on-site audit of the group organiser.
- Only one certification body, in coordination with the other involved certification bodies, will issue a certificate for the entire group.
- A written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is required.
- The group organiser ensures that all activities necessary for certification are performed.

Z 2.5 Expansion Certification in Agriculture

A document audit can be conducted to expand an existing VLOG certification of an agricultural business by adding one or more new areas of application or incorporating one or more new areas of application into a VLOG group certification of an agricultural business (e.g., cattle - cow's milk (raw)).

Such a document audit is only possible if the following requirements are met:

Criterion	Requirement
Change of risk category	The risk category of all VLOG areas of application remains the same or is diminished. Alternatively, the risk category can be graded separately for the individual areas of application under certain conditions (cf. Chapter E 2).

Site/ operating unit	Sites/operating units of the new area of application were audited on site by a VLOG-recognised certification body in the previous VLOG-group/or routine audit.
Additional criteria for facilities that have hitherto been organised into a VLOG group or certified:	
Previous on-site audit by the certification body	The group member was already audited on site by a VLOG-recognised certification body.
Data approval by the previous group organiser	The group organiser agrees in writing to the use of the audit documents (current audit data) for the expansion certification in agriculture.

Table Z 1: Requirements for performing a document audit as part of an expansion certification in agriculture

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

Z 3 Certification Procedure

Z 3.1 Audit Types

The various types of audits for VLOG certification are defined as follows (in alphabetical order):

Document audit:

Auditing of business documents (e.g., process and work instructions, delivery slips) as part of the expansion of certification in agriculture. Document audits may only be performed if the agricultural business meets certain criteria (cf. Chapter Z 2.5).

Initial audit:

During the initial audit, a business will be audited one first time in accordance with the VLOG Standard. It is a full on-site audit of all sites/business units involved in VLOG production of the business. The auditor must assess all applicable requirements of the Standard and/or the established stages. The initial audit forms the basis for the initial certification of the business, provided all prerequisite and requirements are met.

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

- Stages of Logistics, Feed manufacturing, Group organisation Agriculture, Matrix organisation, Food processing/preparation, Retail - Sale of bulk animal food products:
 - The audit is to take place during production but not necessarily during VLOG production. In the case of seasonal production, the initial audit is to be carried out during the production season.
- Agriculture Stage:
 - The audit is to be carried out after conversion to feeding with feed not subject to compulsory labelling.

Reduced initial audit for feed producers and/or feed logistics providers:

If the business is certified according to a quality assurance standard such as QS, KAT or GMP+, initial certification may be awarded on the basis of a reduced initial VLOG audit. This is permissible if a routine audit according to the quality assurance standard was carried out and passed within the last 6 months, at most. In the reduced initial VLOG audit, only those requirements related to VLOG-specific audit points will be assessed. Unassessed requirements will be marked as such in the VLOG checklist and reference will be made to the items and results of the audit. The report from the routine audit according to the other quality assurance standard will be sent to VLOG along with the VLOG certification documents.

Expansion audit:

If, during the validity period of the certificate, the business wants to include new product groups, processes, production lines, etc. into the scope of applicability, this is to be assessed within the framework of an expansion audit.

Whether a full audit must be performed or only specific requirements checked will be decided by the relevant certification body. The latter will also decide, in consultation with the business, whether the audit of the requirements must be performed on-site or whether an audit of all the relevant documents/records will suffice.

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

Combination audit:

Compliance with the VLOG Standard may be assessed during an audit in combination with other standards in order to take advantage of synergies. All prescribed VLOG facility descriptions, checklists and other required documents must be fully completed.

Follow-up audit:

Follow-up audits serve to assess the implementation and effectiveness of corrective actions at the audited business. The auditor will only evaluate specific requirements of the VLOG Standard on-site. If the follow-up audit has been announced beforehand, the certification body must document the reason for the announcement of the audit. The certification body is to select the timing of the follow-up audit such that the efficacy of the specified measures can be reviewed.

Routine audit (to renew or review certification):

The routine audit is a full on-site audit of all sites/business units involved in the VLOG production of the business. All requirements of the present Standard will be assessed by the auditor.

If the business still meets the requirements of the VLOG Standard, the business will be recertified. Each business is responsible for updating the own certification and for having the routine audit performed in a timely manner. The audit takes place during VLOG-compliant activity and/or VLOG production. The routine audit is usually announced beforehand.

Audit on suspicion:

Audits on suspicion serve to investigate suspected non-compliance; the auditor will only assess selected criteria of the VLOG Standard on-site. Audits on suspicion are generally not announced beforehand. If the audit on suspicion is announced beforehand, the certification body must document the reason for the announcement of the audit.

Z 3.2 Application for Certification, Conclusion of an Auditing Contract

The business/matrix organiser/group organiser applies for certification with a VLOG-recognised certification body and thereby specifies the desired scope of applicability (cf. Annex (12) incl. stage and sub-stage) which is to be certified. A written agreement on the conduct of independent audits and individual/matrix or group certification according to the VLOG Standard shall be concluded between the business/the matrix organiser/the group organiser and the VLOG-recognised certification body.

Z 3.3 Risk Grading of Businesses

The VLOG Standard follows a risk-based approach for the evaluation of processes and monitoring of the business. This includes risk grading of the business. The risk grading serves to identify and estimate potential sources of introduction and risk of contamination of GMOs in the business.

Depending on the business stage, the risk grading and/or risk category will have an impact on audit intervals and/or the number of analyses.

Grading will be done by the business¹ before the initial and routine audit; it is assessed and, if necessary, redefined by the auditor and evaluator in every audit. The definition is to be documented or modified as needed in the checklist by the auditor and evaluator, as necessary.

Businesses at the Agriculture and Food Processing stages are to be graded into so-called risk categories. The following risk categories shall be differentiated:

- Risk Category 0 (no or only low risk)
- Risk Category 1 (moderate risk)
- Risk Category 2 (high risk)

Z 3.3.1 Logistics and Feed Manufacturing Stage

In the Feed Manufacturing and Logistics Stages, grading into risk categories will be based on the production system of VLOG production (e.g. GMO at the site or solely production exempt from mandatory labelling).

There will be no grading into risk categories at these stages.

Z 3.3.2 Agriculture Stage



Explanation: Guidance on how to grade agricultural businesses into the correct risk categories is available on the VLOG website:

https://www.ohnegentechnik.org/risk_grading_agriculture.

General

Risk grading is performed according with the criteria listed in the following table

In case different results are obtained using the criteria for risk assessment, the business will be graded as belonging to the highest/strictest risk category.

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

¹ and/or group or matrix organizer, in the case of group or matrix certifications

If several areas of application in the business are part of a VLOG certification, risk grading is performed according to the following criteria:

- across all areas of application (one risk category per business – and only the highest/strictest risk category shall apply) OR
- separately for individual areas of application (one risk category per area of application) if the following conditions are met:
 - the areas of application are completely separate from each other (completely separate facilities/feeding equipment/machines in contact with feed), and
 - all grading criteria in the following table are observed for each area of application

These conditions being met, the different risk categories for the individual areas of application result in different audit intervals (cf. Chapter Z 3.4)

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site. Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit. 	<p>Feed subject to compulsory labelling, which can be swapped, is present at the site.</p> <p>Grading in Risk Category 1 is only possible if installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling, which can be swapped, are completely segregated from the VLOG operating unit.</p>	<p>Following initial conversion to VLOG production (possibly time-lagged), feed subject to compulsory labelling, which can be swapped and is handled with the same installations/feeding equipment/machines used for VLOG feed manufacturing, is present at the site².</p>
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn	<p>After the beginning of “Ohne Gentechnik” feeding, no switch to feeding with feed subject to compulsory labelling takes place in the VLOG operating unit/in the VLOG barn.</p>		<p>After initial conversion to “Ohne Gentechnik” feeding, feeding oscillates between “Ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling (e.g. in production systems involving animals whose lifespan is longer than the “Ohne Gentechnik” minimum feeding conversion period).</p>
Certification status of risk-prone feed used in VLOG production (cf. Chapter E 4.2)	<p>Risk-prone feed and the feed supplier (excluding see Chapter B 1 and C 1) must be certified pursuant to the VLOG Standard or a standard recognised as equivalent. This also applies to oils used for dust binding in grinding and mixing facilities.</p>		<p>Risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.</p> <p>Risk-prone feed is being used that has been certified pursuant to the VLOG Standard but lost the certification status due to a violation</p>

² This also includes the internal or external dual use of mixer vehicles for VLOG production.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
			of the certification obligations in the supply chain (cf. Chapter B 1 and C 1).
Use of grinding and/or mixing facilities	<p>Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard.</p> <p>Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.</p>	<p>Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard or stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.</p> <p>Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:</p> <ul style="list-style-type: none"> • The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio³). • Measures to prevent contaminations with GMO are described in the QM manual of the facility operator. 	<p>Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard.</p> <p>Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.</p> <p>Grading into Risk Category 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT).</p>
Animal transport/livestock trade	The animals are not fed in the business/during transport.	The animals are fed in the business/during transport/during transshipment and rest periods. In this case, the other risk-grading criteria in this table also apply.	

Table Z 2: Grading into risk categories at the Agriculture stage

³ Exception: If the VLOG farmer's organic-certified grinding and/or mixing facility of is used exclusively for organic-certified feed, the facility can be graded in Risk Category 0

Z 3.3.3 Food Processing/Preparation Stage

Risk grading will be carried out according to the following criteria:

Risk Category 0

- The business only handles raw materials and products for which “Ohne Gentechnik” labelling would be permissible
- As a matter of principle, businesses that process or store GMOs on their premises cannot be graded as Risk Category 0.

Risk Category 1

- In the business and process steps there is a clear physical segregation in the processing of products for which “Ohne Gentechnik” labelling would be permissible and such products that do not meet the requirements for “Ohne Gentechnik” labelling

Risk Category 2

- There are process steps in the business without physical but with temporal segregation in the processing of products for which “Ohne Gentechnik” labelling would be permissible and such products that do not meet the requirements for “Ohne Gentechnik” labelling
- There is at least one test result from the audit period under consideration that exceeds the threshold value of 0.1% GMO per ingredient. This resulted from the business’ failure to undertake actions to avoid contamination.

Z 3.3.4 Retail Stage

Risk grading is based on the organisation of purchasing (centralised or decentralised).

There is no grading into risk categories at this stage.

Z 3.4 Audit Frequency

The audit intervals shown in Table Z 3 are based on the type of certification and the risk grading of the business.

The audit interval commences as of the date the certificate is first issued.

If a follow-up audit for a business with an audit interval of > 1 calendar year is conducted earlier than necessary (e.g., one calendar year earlier), the subsequent routine audits are also to be scheduled correspondingly earlier.

The following shall apply to the Matrix Organisation Logistics and Feed Manufacturing and Group Organisation Agriculture and Retail stages:

- At the start of the new auditing season, the matrix/group organiser must coordinate the audits for matrix/group members planned for the year with the certification body.
- The certification body is responsible for and monitors the compliance with audit dates. This is to be done with the support of the matrix/group organiser.
- The matrix/group organiser is responsible for the implementation of corrective actions by the group members. The certification body is responsible for monitoring the effectiveness of the corrective actions.

Stage		Audit frequency of routine audits	Specific requirement/note
Individual certification			
Logistics		Once per calendar year	
Feed manufacturing		Once per calendar year	If a mobile grinding and/or mixing facility has a QS certification, the VLOG auditing interval can be adjusted to match the audit interval under QS controls (max. 2 years). The validity period of the VLOG certificate may extend no longer than the end of the second following year (relative to the date of the VLOG audit).
Agriculture	Risk Category 0	Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
	Risk Category 1	Within 2 calendar years	i.e. at the latest in the second following calendar year of the last audit

Stage		Audit frequency of routine audits	Specific requirement/note
	Risk Category 2	Once per calendar year	Supplement – Animal transport/livestock trade sub-stage If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit under the following conditions: <ul style="list-style-type: none"> • Direct transport from the supplier to the buyer (e.g., the abattoir), without intermediate stabling and/or feeding or <ul style="list-style-type: none"> • Unloading or trans-shipment between the starting point and the transport destination (e.g., at a collecting point) solely with respect to animals with individual identification and no feeding of VLOG animals.
Food Processing and Preparation		Once per calendar year	
Matrix Organisation in Logistics and Feed Manufacturing			
Matrix organiser		Once per calendar year	
Matrix site Logistics and Mobile Grinding and Mixing Facilities Stages		Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
Matrix site Feed Manufacturing stage (except for mobile grinding and/or mixing facilities)		Once per calendar year	
Agricultural Group Organisation			
Group organiser		Once per calendar year	
Group member risk category 0		Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit

Stage	Audit frequency of routine audits	Specific requirement/note
Group member risk category 1	Within 2 calendar years	i.e. at the latest in the second following calendar year of the last audit
Group member risk category 2	Once per calendar year	
Combination of individual certification and group certification in agriculture or combination of multiple group certifications with various areas of application per business:		
If an agricultural business is certified as part of a VLOG group for one area of application and is individually certified for another area of application, the audit interval is based on the respective risk category of the business (cf. Chapter Z 3.3). Under certain conditions, different areas of application can be graded into different risk categories, thereby enabling different audit intervals (cf. Chapter Z 3.4).		
Group Organisation Retail		
Group organiser	Once per calendar year	If all the audit criteria, incl. original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.
10% of the group members if centrally purchased, traceability up until sale to the customer must be ensured	Once per calendar year	The audits are announced. If the audits are announced and the certification body concludes, based on its on-site audit, that traceability can only be ensured up until the service counter, 10% of the audits of branches in subsequent years will be unannounced.
10% of the group members if centrally purchased, traceability up until the service counter must be ensured	Once per calendar year	The audit is unannounced.
100% of the group members if products are purchased locally	Once per calendar year	

Stage	Audit frequency of routine audits	Specific requirement/note
External Service Providers		
External service providers that are audited as part of the VLOG audit of the client	With every routine audit of the client	

Table Z 3: Audit Intervals

Z 3.5 Planning of audits

If announced audits are conducted, the following shall be coordinated between the auditor/certification body and the business:

- the audit date/time and expected duration thereof
- the audit area (including all relevant sites and external service providers included in the VLOG certification)

Furthermore, the auditor/certification body must draw up an audit plan.

Z 3.6 Performance of the Audit

The steps of the initial or routine audit are as follows:

Introductory meeting:

- Introduction of the auditor and the persons involved in the audit
- Explanation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule
- Checking whether there is a Standard Usage Agreement, including VLOG ID (10-xxxxx) and, if relevant, a sub-VLOG ID (10-xxxxx-A/B, etc.) for the sites included in the certification⁴

Document and facility inspection (sequence to be defined by the auditor):

Document inspection:

- Review of the facility description and verification of risk grading, if necessary
- Inspection of the relevant business documents (e.g. organisational chart/organisational structure, quality management system, bills of lading)
- Verification of compliance with the requirements of the VLOG Standard (e.g. labelling of raw materials/feed, risk management)
- Mass flow control (input and output plausibility check in the facility)

Facility inspection:

- On-site inspection of the production areas, equipment and related production processes at all the sites included under the certification and of the activities of external service providers requiring certification
- Verification of compliance with the system requirements (e.g. segregation of goods flows, risk analysis)
- Interview of staff
- As provided for and/or in the case of suspected non-compliance, sampling and GMO testing, as necessary

⁴ For group or matrix organisations, the Standard Usage Agreement is concluded between VLOG and the group or matrix organiser. Therefore, whether group or matrix members have the agreement in question need not be checked.

Grinding and mixing facilities:

- Mobile grinding and mixing facilities: At least two of the facilities that are registered for VLOG certification will be inspected by the auditor (in particular through visual inspection and comparison of documents). The selection is performed in a risk-based manner. If the business only uses one facility for VLOG production, then this facility is to be inspected.
- Stationary grinding and/or mixing facilities: The inspection includes all facilities associated with the agricultural business.

Final discussion:

- Summary of identified deviations and preliminary result
- Determination of any corrective actions to be taken by the business. These have no effect on the audit result.

Z 3.7 Audit Documentation

The auditor documents the evaluation of the requirements and, if applicable, any identified deviations in the stage-relevant VLOG checklists in their most recent version. The certification body may create and use checklists in a customised format on the basis of the current VLOG checklists, provided the content of the checklist, the wording of the audit items and the underlying results calculation are used without change.

At the close of the audit, the auditor and the business shall confirm by electronic means or in writing that the VLOG checklist(s) have been filled-out completely. The certification body shall determine the form of electronic confirmation.

Z 3.8 Evaluation of Compliance of the Requirements

The auditor examines and evaluates the compliance with each VLOG Standard requirement.

The auditor must demonstrably justify and document any identified deviations and breaches (B, C and KO grading) as well as the assessment N.A. in the checklist.

The following grading levels have been set for the evaluation of requirements at all stages:

Grading	Description	Points	Note
A	Full compliance with a requirement	10 points	
B	Minor to moderate deviations from the requirement	5 points	
C	Non-compliance or major deviation from the requirement	-10 points	
KO	Requirements with a critical impact on "Ohne Gentechnik/"VLOG geprüft" labelling in case of non-compliance	Audit not passed	KO criteria may only be assigned an A, B, or KO grade. They are listed in the respective chapters of the stages and marked accordingly in the checklists.

Grading	Description	Points	Note
			A KO requirement may not be graded N.A in most cases.
N.A.	Not applicable	-	If an auditor reaches the conclusion that a particular requirement is not applicable to the business, this requirement may be assessed as N.A. (= not applicable). A KO requirement may not be graded N.A in most cases.

Table Z 4: Evaluation of Compliance of the Requirements

Z 3.9 Determination and Handling of Corrective Actions

The business shall establish written corrective actions and implementation periods for all deviations and violations found (B and C grades and KO grading), either during the audit or within four weeks after the audit. They shall be approved by the competent certification body.

A certificate may only be issued after the business has defined corrective actions and their deadlines for all deviations and breaches and these have been released by the auditor or the certification body.

B and C deviations may be examined by subsequent submission of representative documentation or, if this is not possible, by an on-site follow-up audit. This is to be decided by the certification body in a risk-based procedure.

The business or the group or matrix organiser shall be responsible for the implementation of the corrective actions in the business or by the group members or at the sites. The certification body is responsible for monitoring the effectiveness of the corrective actions.

The statements (cf. ChapterZ 3.10) and Annex (10) apply if the business is sanctioned and/or in connection with corrective actions.

Z 3.10 Audit Result

The audit result is evaluated on the basis of the points attained, as determined in accordance with Chapter Z 3.8.

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
<ul style="list-style-type: none"> more than 75% of the maximum points No KO grading 	passed	<ul style="list-style-type: none"> Issuance of the VLOG certificate or inclusion in the VLOG group or VLOG matrix 	<ul style="list-style-type: none"> When initial certification is in progress or after the withdrawal of a certificate, feed/raw materials/products and animals may not be labelled as “VLOG geprüft” or “VLOG” until after the certificate is (re)issued or after inclusion in the matrix/group.
<u>Only for document audit (expansion certification in agriculture)</u> <ul style="list-style-type: none"> No KO grading “A” grade for the facility description requirement 	passed	<ul style="list-style-type: none"> Issuance of the VLOG certificate or inclusion in the VLOG group 	<ul style="list-style-type: none"> When initial certification is in progress or after the withdrawal of a certificate, feed/raw materials/products and animals may not be labelled as “VLOG geprüft” or “VLOG” until after the certificate is (re)issued or after inclusion in the matrix/group.
<ul style="list-style-type: none"> less than 75% of the maximum points No KO grading 	not passed	<ul style="list-style-type: none"> Within process of initial certification: No issuance of a VLOG certificate or inclusion in a VLOG group or VLOG matrix Within process of follow-up certification: no issuance of a new VLOG certificate (currently valid certificate is not suspended or revoked) or inclusion in a VLOG group or VLOG matrix remains in place for the time being until the end of the calendar year A new routine audit must be performed 	<ul style="list-style-type: none"> When initial certification is in progress: feed/raw materials/products and animals may not be labelled as “VLOG geprüft” or “VLOG” until after the certificate is issued.

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
		<ul style="list-style-type: none"> The certification body must notify VLOG within 2 working days about the failure to pass the audit (does not apply to group or matrix members who did not pass the audits) 	
<ul style="list-style-type: none"> One or more KO gradings 	not passed	<ul style="list-style-type: none"> No issuance of a VLOG certificate or inclusion in the VLOG group or VLOG matrix Certification body must suspend the current VLOG certificate within 2 working days or the group or matrix member must be removed from the list of members or sites The business must implement the required corrective actions before the VLOG certificate is re-issued or before it will be added back to the list of members or sites A new routine audit must be performed. If the sole reason for KO evaluation was the lack of documentation, a document inspection can be performed instead. The decision whether a new routine audit or a document inspection must be performed is the responsibility of the certification body. Certification body must notify VLOG about the KO grading within 2 working days (does not apply to audit of group or matrix members who did not pass) 	<ul style="list-style-type: none"> With respect to an initial certification or after the withdrawal of a certificate, feed/raw materials/products and animals may not be labelled as “VLOG geprüft” or “VLOG” until after the certificate is (re)issued. If, due to the audit results, the certification of the VLOG matrix/VLOG group is suspended or revoked, the labelling with “VLOG”/“VLOG geprüft” or the “Ohne GenTechnik” seal is not permitted for any members of the VLOG matrix/VLOG group. The matrix/group may continue to market “VLOG” food and feed labelled “VLOG geprüft” even if individual sites/group members were excluded from the matrix/group. In this case, the marketing of food labelled “VLOG”/feed labelled “VLOG geprüft” will be prohibited only for the excluded sites/group members.

Table Z 5: Evaluation of audit results

If the audit is not passed, VLOG will decide on the termination of the Standard Usage Agreement, and also on the revocation of the respective usage licence for the “Ohne GenTechnik” seal and/or the “VLOG geprüft” word mark or the “VLOG geprüft” seal from licensees.

Z 3.11 Evaluation, Review by the Certification Body

Within the scope of the evaluation/review of the VLOG audit, the grading of the auditor in the completed checklist and the information indicated in the facility description will be re-checked by the certification body for completeness and plausibility. If relevant for the respective stage, the risk grading is also to be reviewed by the certification body and, if necessary, corrected and documented in the checklist. If there is a change in the risk grading or the audit results, the business shall be informed of this as quickly as possible.

The certification body is entitled to perform follow-up audits, audits on suspicion and additional checks.

The competent certification body decides according to the four-eye principle on the final audit result after the audit.

Z 3.11.1 Distribution of the Audit Report

The certification body shall issue an audit report to the business for every audit, including the deviations found and the audit results. In the case of a matrix or group organisation, the audit report is to be distributed to the group/or matrix members via the group/or matrix organiser or sent to them directly, depending on what has been determined.

Z 4 Certificate Issuance

Z 4.1 Prerequisites and Conditions for the Issuance of a Certificate

The following prerequisites must be met by the business for a certificate to be issued:

- Signed contract with a VLOG-recognised certification body
- Standard Usage Agreement with VLOG signed by both parties
 - Including VLOG ID or any VLOG sub-ID issued by VLOG
- Passed VLOG audit
 - Any corrective actions and implementation periods established have been cleared by the certification body

After passing an audit and taking into consideration Chapter Z 4.2, the certification body will issue the business with a certificate according to the VLOG Standard no later than 8 weeks after the audit. If the certificate is not issued within 8 weeks after the audit, a new routine audit is to be performed.

If an individual certification with multiple locations involves audits at several locations, the 8 weeks are calculated from the audit of the last location.

For group certifications and matrix certifications, the 8 weeks count as follows:

- for the initial certification: from the last audit necessary for the initial certification for a group/matrix member or group/matrix organiser (depending on which occurs later)
- for the follow-up certification: from the audit of the group/matrix organiser

Z 4.2 Requirements for VLOG Certificates

VLOG certificates will be issued according to Annex (11). Layout deviations are permitted without approval by VLOG (except for the "Ohne GenTechnik" and "VLOG geprüft" seals).

Area of application

The scope or scopes of applicability listed on the VLOG certificate is defined in accordance with Annex (12).

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

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

Annex to the certificate

If information about the certified business sites and/or scope of applicability is indicated on a certificate annex, the following requirements apply:

- Reference to the certificate, including specification of the unique certificate identification number.
- Listing of the full name of the certified business.
- The annex must be assigned a unique identifier.
- The certificate must contain a reference to the annex, including specification of this unique identifier.

Z 4.3 Specific Requirements for Matrix and Group Organisations

Z 4.3.1 Certificate

The following requirements must be met in addition to the requirements referred to in Chapters Z 4.1 and Z 4.2 when certificates are issued for matrix/group organisations:

Matrix Organisation - Logistics and Feed Manufacturing

The VLOG certificate shall be issued with the company name of the matrix organiser of the VLOG matrix.

Matrix members do not receive individual VLOG certificates.

The certification body shall also provide the matrix organiser with the list of sites, including the date of the last routine audit.



Explanation: "Ohne Gentechnik"/"VLOG geprüft" labelling of feed, raw materials and products at one site is only permissible if the site was reported to the certification body in accordance with the requirements of Chapter Z 2.2, the matrix organiser has performed the initial

<i>collection of data, if applicable, and the certification body has performed an audit at the site, if applicable, and the site has been approved by the certification body for the VLOG matrix.</i>
Group Organisation - Agriculture, Group Organisation - Retail
<p>The VLOG certificate will be issued for the VLOG agricultural group and must contain the business name of the group organiser.</p> <ul style="list-style-type: none"> For stage group organisation agriculture with the defined scope of applicability of animal production (cf. Annex (12)). For stage retail with the defined scope of applicability of bulk products (cf. Annex (12)). <p>Group members do not receive individual VLOG certificates.</p> <p>The certification body must also give the group organiser the membership list, including the last routine audit date.</p> <p>i <i>Explanation: “Ohne Gentechnik” labelling of food products of a group member is only permissible once this group member has been reported to the certification body in accordance with the requirements in Chapter Z 2.3 or Z 2.4, an initial collection of group member data has been done by the group organiser, an audit of the group member has been done by the certification body, if necessary, and the group member has been accepted by the certification body for the VLOG group.</i></p>

Table Z 6: Specific requirements for the issuance of certificates for matrix/group organisations

Z 4.3.2 Confirmations for Matrix Members/Sites and Group Members

The certification body can issue the business a written confirmation indicating that it is part of a VLOG matrix/group organisation. The confirmation will state that it is valid only as long as the business is a member of the VLOG matrix/group and the matrix/group holds a valid certificate.

i *Explanation: A confirmation regarding inclusion in a VLOG group or VLOG matrix is available to you at the VLOG website:*

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

i *Explanation: The matrix/group organiser’s permission is not necessary to issue the confirmation. However, it is recommended that the competent certification body inform the matrix/group organiser of the issuance of the confirmation.*

Z 4.4 Validity of the VLOG Certificate

All stages
<p>The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).</p>

Exceptions to this are to be handled as follows:
<p>Feed Manufacturing Stage</p> <p><u>VLOG-certified mobile grinding and mixing facilities simultaneously certified under the guidelines of the QS system:</u></p> <ul style="list-style-type: none"> If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 years), the validity may extend no longer than the end of the second following year (relative to the date of the VLOG audit).
<p>Agriculture Stage</p> <p><u>Individual VLOG-certified businesses:</u></p> <ul style="list-style-type: none"> The validity of the VLOG individual certification is to be based on the audit interval according to Chapter Z 3.4 and may extend no longer than the end of the year in which the next routine audit must be performed at the latest. Therefore, the audit interval is dependent on the risk category of the business or the scope of application of the individual certification. <p><u>VLOG-certified livestock traders/transporters which are simultaneously certified under the guidelines of the QS system:</u></p> <ul style="list-style-type: none"> If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 or 3 years), the validity may extend no longer than the end of the second or third following year (relative to the date of the VLOG audit).

Table Z 7: Validity of the VLOG Certificate

Z 4.5 Withdrawal of the Certificate

In the following cases the VLOG certificate will be withdrawn by the competent certification body:

- Termination (without a notice period) of the audit agreement before the end of the period of validity of the certificate
- Termination (without a notice period) of the Standard usage agreement before the end of the period of validity of the certificate
 - by the business
 - by VLOG
- Absence of a VLOG audit due to the issuance of at least one KO grading (cf. Table Z 5 (cf. chapter Z 3.10))

Z 4.6 Transferring Certification in the Event of Change of Ownership, Certification Body or Group/Matrix Member

Transferring Certification in the Event of Change of Ownership or Change of Business Name

If a change of ownership and/or change of business name occurs at a VLOG-certified business or site, VLOG certification may be transferred to the new business.

The following steps must be taken in this regard:

- The previously VLOG-certified business gives the certification body permission to use the data for the new business.

2. The certification body undertakes VLOG certification of the new business on the basis of previously submitted audit documents; the period of validity of the updated VLOG certificate may not exceed that applicable to the previous certificate.
3. The certification body provides the updated certificate to VLOG as soon as possible.

If applicable, further requirements must be clarified with the responsible certification body.

For group or matrix certifications, the following additionally applies:

- The risk categories/grading and audit intervals for the group or matrix members remain the same.

Transferring Certification in the Event of a Change of Certification Body

For a change of certification body, VLOG certification may be updated by the new certification body on the basis of the previous routine audit. This requires each the consent of the certified business as well as of the former and new certification bodies.

The following steps must be taken in this regard:

1. The VLOG-certified business declares its consent to the previous certification body for the data to be forwarded to the new certification body.
2. The previous certification body informs VLOG regarding the termination/cancellation of the contractual relationship with the VLOG-certified business.
3. The VLOG-certified business informs VLOG regarding the switch to a new certification body. VLOG updates the relevant information in the VLOG database.
4. Upon request by the new certification body, the previous certification body transfers the complete audit and certification documents from the most recent routine audit, and any follow-up audits, to the new certification body.
5. The new certification body may certify the business according to the VLOG Standard on the basis of the complete audit documents; the period of validity of the updated VLOG certificate may not exceed the period of validity of the previous certificate.
6. The new certification body sends the updated certificate and information regarding the recertification to VLOG.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.

For group or matrix certifications, the following additionally applies:

- The risk categories and audit intervals of the group-/matrix members will remain in effect. The change of certification body does not result in a repeated initial certification, but triggers a follow-up certification (cf. Chapter Z 2.2 or Z 2.3).

Change of group/matrix member

If a group/matrix member changes to a different VLOG group/matrix, the member's most recent group/matrix audit can be recognised as an audit for the new group/matrix organisation. The risk categories and audit intervals of the group member/matrix site will remain in effect.

The following steps must be taken in this regard:

1. The previous group/matrix organiser declares its consent to the previous certification body for the data to be forwarded to the new certification body.
2. The previous certification body transfers all audit and certification documents from the most recent routine audit of the respective group/matrix member to the new certification body.
3. The new certification body checks which tasks were performed by the group/matrix organiser in the previous VLOG group/matrix and compares them to the new VLOG group/matrix and the responsibilities of the new group/matrix organiser.

4. The group/matrix member is removed from the previous group/matrix organiser's list of members or site list.
5. The new certification body can recognise the most recent group/matrix audit of the group/matrix member as an audit for the new group/matrix organisation based on the existing audit documents. In this case, the business/site can be included in the VLOG group/matrix without an additional audit.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.