



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

**Version 23.01**

Published on 1 September 2022

Obligatory as of 1 January 2023



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## **Part A - General**

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## **Part A: General**

### **A 1 Preamble**

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

### **A 2 Introduction**

The German EC Genetic Engineering Implementation Act (EGGenTDurchfG) has been in force since May 2008 which is the legal basis for the “Ohne Gentechnik” label. It governs the labelling of food which has been produced without the “use of genetic engineering processes”. Only the designation “ohne Gentechnik” may be used to indicate that a food product advertised or distributed on the German market was produced without the use of genetic engineering.

### **A 3 VLOG as Standard-Issuing Body**

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

### **A 4 Purpose**

The VLOG Standard details the requirements for “VLOG geprüft” feed or “ohne Gentechnik” food production and is designed to harmonise the review of process and quality assurance systems. The cross-stage certification obligation and the traceability requirement safeguard the entire production chain from “VLOG geprüft” feed manufacturing through “VLOG” food-processing.

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

### **A 5 Scope of Application**

The present Standard forms the basis for certification for the stages mentioned in A 6 along with associated services and activities in the EU. The VLOG Standard and the EGGenTDurchfG are based on the labelling provisions of Regulations (EC) 1829/2003 and 1830/2003 and therefore may not be applied on an analogue basis outside of the EU. Businesses outside the EU may be certified only after approval by VLOG. The VLOG Standard has been drafted in the German language and translated into English. If there are discrepancies between the translation and the German version, the German original shall prevail.

## A 6 Structure

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

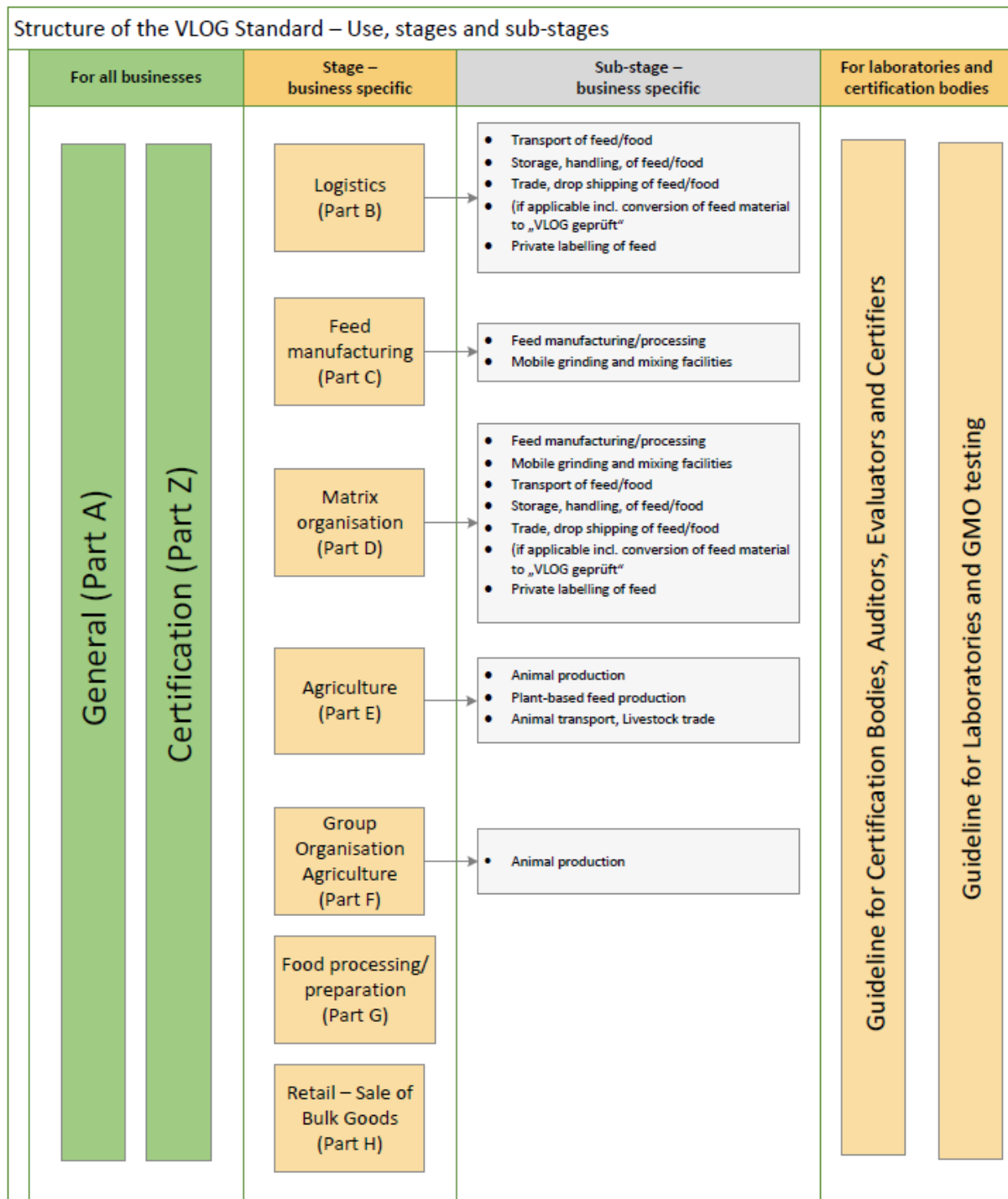


Figure A 1: Structure of the VLOG Standard

## A 7 Review of the VLOG Standard

The VLOG Standard is reviewed, revised and supplemented on a regular basis. The VLOG Board of Directors is advised in this regard by the Standard Technical Working Group. In order to enable information about the upstream and downstream areas of food production to be incorporated into the Standard, relevant sectors are represented in the Standard Technical Working Group. The VLOG Board of Directors appoints the members of the Standard Technical Working Group.

## A 8 Legal Basis and Interpretation

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

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

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

### A 8.1 Basic Requirements for Food and Feed

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

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

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

## A 8.2 Specific Requirements for Feed

### “Adventitious or technically unavoidable”

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

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

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

To determine as of what level feed is subject to compulsory labelling within the meaning of Regulations (EC) No. 1829/2003 and 1830/2003, please consult in particular Part 5 and Annexes 1 and 2 of the Feed Guideline.

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

### Feed in “Ohne Gentechnik” production

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

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

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

- they are made from GMOs or GMO components and therefore must be labelled as “genetically modified” themselves.

According to the existing legal provisions, any feed additives that are produced by or with the help of GMOs need not be labelled and may be used without restrictions.

### **A 8.3 Specific Requirements for Food**

The requirements for raw materials to qualify for “ohne Gentechnik” go significantly beyond the absence of a labelling obligation according to Regulations (EC) No. 1829/2003 and No. 1830/2003.

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

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

In general, adventitious or technically unavoidable traces of genetically modified material are tolerated up to a threshold of at most 0.1 % per ingredient.

The following applies to processing aids and other substances:

- Production by GMOs is precluded.

### **A 8.4 Additional Requirements for Processing Aids and other Substances**

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

For the production/processing of VLOG products, no processing aids or other substances within the meaning of Sec. 3a (5), EGGenTDurchfG may be used which contain, consist of, or are produced from GMOs labelled in accordance with Regulation (EC) 1829/2003 or 1830/2003, or which would have to be so labelled were they placed into circulation.

## **A 9 Auditing System**

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

### **A 9.1 Self-Monitoring by the Business**

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

## A 9.2 Independent Audits

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

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

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

## A 9.3 Integrity Audits

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

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

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

Verification audits may be performed with and without advance notice.

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

## A 10 Labelling, Use of the Seal

Any business that meets the statutory prerequisites of the EGGenTDurchfG may label its products in Germany with the words “Ohne Gentechnik”. In this case, Sec. 3a and Sec. 3b of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) apply. However, the use of the unitary “Ohne GenTechnik” seal (cf. Figure A 2) must be requested from VLOG (cf. Chapter A 10.1).

### A 10.1 “Ohne GenTechnik” Seal

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



Figure A 2: "Ohne GenTechnik" seal for food

## A 10.2 "VLOG geprüft" Seal and Word Mark

In order to explicitly indicate on the package and/or the bill of lading accompanying a VLOG-certified feed shipment the absence of the obligation to label the product in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003 – and thus its suitability for "ohne Gentechnik" food production – binding labelling with the word mark "VLOG geprüft" or, alternatively, with the word/design mark (seal cf. Figure Figure A 3) "VLOG geprüft" is required for VLOG-certified feed (cf. Chap. B 2.8 or C 3.3). The Standard Usage Agreement concluded with VLOG as the holder of trademark rights governs both the use of the word mark and the use of the work/design mark. The specific usage of the word/design mark is governed by a licence agreement between each licensee and VLOG. The basis for this agreement is a certification according with the VLOG Standard or a standard recognised as equivalent.



Figure A 3: "VLOG geprüft" seal for feed



## Glossary: Definitions of terms

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

**Animal category:** Animals which fundamentally differ in their husbandry conditions are regarded as different animal categories (e.g. breeding pigs/fattening pigs, laying hens/chickens for fattening, heavy livestock/dairy cattle).

**Animal production:** The production or rearing of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.

**Animal transport:** Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. A business exclusively providing animal transport only possesses the animals.

**Auditor:** Personnel made available by the certification body for the auditing of businesses. The auditor's responsibilities are described in DIN EN ISO/IEC 17065.

**Batch:** An identifiable quantity of feed verifiably having common properties, such as origin, type, type of packaging, packer, shipper, or labelling.

**Business:** A general organisation which may consist of multiple sites/operating units.

**Calendar year:** Time period from 1 January until 31 December of a year. The VLOG Standard refers to the Gregorian calendar.

**Calves:** Cattle offspring from birth to 6 months old.

**Carrier:** A business that transports goods from one location to another. The goods do not have to be the property of the carrier/shipping company.

**Certifier:** Personnel made available by the certification body for certifying businesses. The certifier's responsibilities are described in ISO/IEC 17065.

**Component:** All ingredients, additives, auxiliary processing substances, or other substances within the meaning of Section 3a, EGGenTDurchfG used in the production of feed or food products.

**Compound feed:** Compound feed are mixtures of feed materials (input products for feed), with or without additives, which are intended as complete or supplementary feeds for animal nutrition.

**Contamination:** Generic term for carryover, interchange or mixing

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

**Correction:** A correction is a measure to eliminate a known fault.

**Corrective action:** Action/actions, leading to the elimination of the root causes of a fault, a shortcoming or any other undesired situation in order to avoid their reoccurrence or to reduce the frequency of reoccurrence.

**Defective product:** Food or feed that does not comply with "Ohne Gentechnik" or "VLOG geprüft" requirements.

**Drop shipping:** Drop shipping refers to the trading method wherein the goods are transported directly from the supplier to the customer of the drop shipper. The drop shipper does not take physical possession of the goods, but has a contractual relationship with the customer and issues the invoice for the goods.

**Dual production:** Shared use of facilities and/or transportation means for the production, processing, transport, storage, handling and/or trade of "Ohne Gentechnik" food or "VLOG geprüft" feed and food that does not comply with "Ohne Gentechnik" or "VLOG geprüft" requirements.

**EGGenTDurchfG:** German act on the implementation of European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes (German EC Genetic Engineering Implementation Act).

**Evaluator:** Personnel made available by the certification body for the auditing of businesses. All information and results related to the on-site audit (evaluation) must be evaluated. The evaluator may not be involved in the on-site audit. The evaluator issues the certifier a recommendation regarding whether certification should be granted. If the evaluator and certifier are different people, the result of the evaluator must be documented separately.

**External service provider:** A business (contractor) that provides services and processes to another business (client) for a fee. The duration and substance of these services must be established in writing (e.g., by contractual agreement).

Examples of external services at the various stages:

- Logistics: Transport/storage of feed/food
- Feed production: Job order production of feed (private labelling)
- Agriculture: Outsourcing of part of production to a facility/stall that does not belong to the business
- Food processing: Slicing of cheese (slicer), sterilisation of spices, bottling of food

**Facility:** Legally independent businesses with one or several sites.

**Feed business:** All businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in the production, manufacturing, processing, storage, handling, transportation or distribution of feed, including manufacturers who produce, process or store feed to be fed to animals in their own business (Regulation (EC) No. 178/2002).

**Feed manufacturing/processing:** All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc.

**Feed material:** Feed materials are feeds intended, as such or in processed form, to be fed to animals or used in the production of compound feed. Feed materials are of plant, animal or aquatic origin, or composed of other organic or inorganic matter.

**Feed not subject to compulsory labelling:** Feed which, according to Regulations (EC) No. 1829/2003 or No. 1830/2003, is not subject to compulsory labelling as “genetically modified”.

**Feed subject to compulsory labelling:** Feed which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, has to be labelled as “genetically modified”.

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

**Food business:** Any and all businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in an activity connected to the production, processing, and distribution of food.

**Food preparation:** Preparation comprises sorting and labelling unprocessed products under Regulation (EC) No. 852/2004 as well as the activities referred to in Art. 2 (1) n) of Regulation (EC) No. 852/2004 and slaughter of animals.

**Food processing:** Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding or a combination of these various processes (Regulation (EC) No. 852/2004).

**Food:** Any and all substances or products that are intended for, or which can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

**GMO:** Genetically modified organisms. According to EU Directive 2001/18/EC these are organisms in which the genetic material has been modified by means of molecular biological methods in a way that naturally is not possible by interbreeding and/or recombination.

**Group member:** (Agricultural) business, site or branch contractually integrated into a VLOG group.

- A group member may only be a member of one VLOG group for a specific area of applicability (e.g. cattle – cow's milk (raw)).
- If a group member produces animals/animal products for different areas of applicability (e.g. cow's milk (raw) and fast stock), the business may be a group member of different VLOG groups for each area of applicability (cf. expansion certification Agriculture).
- If a business is a member of a VLOG group, independent certification according to the VLOG Standard is not permissible for the same area of applicability.

**Group organiser:** Business in a VLOG group that organises the certification of the group and holds responsibility for a risk management system that includes the agricultural group members or retail group members.

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

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

**Internal audit:** General audit process for all of the business's own activities. Carried out by or on behalf of the business for internal purposes. Internal auditing is an independent, objective monitoring and consulting activity that is intended to provide added value and improve the operations of a business.

**Last living organism:** The last organism that is able to pass on its genetic information.

**Livestock trade:** Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. As opposed to the animal carrier, a livestock trader owns the animals and may also take possession of the animals if applicable.

**Logistics business:** Any and all businesses which carry out logistical activities associated with food and feed, e.g., transport, storage, handling, distribution, loading and unloading.

**Lot:** See batch.

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

**Matrix organiser:** Business in a VLOG matrix that organises the certification of the matrix and holds responsibility for a risk management system that includes all matrix sites.

**Matrix site:** A site that is contractually integrated into a VLOG matrix via a matrix member.

**Mineral feed:** Supplementary feed containing at least 40 % crude ash.

**Mobile Grinding and Mixing Facilities:** Facilities used commercially and for multiple operations, classified as a feed business (cf. Part C).

**Non-compliant feed, animals, raw materials, products:** do not meet the specifications of the VLOG Standard.

**Non-VLOG animals:** Animals not certified in accordance with the VLOG Standard.

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

**“Ohne Gentechnik”-compliant feeding:** Feeding that meets the specifications of the EC Genetic Engineering Implementation Act (i.e. feeding solely with feed that is not subject to compulsory labelling).

**“Ohne Gentechnik” quality, products and raw materials:** Usable in the “Ohne Gentechnik” process (meets the requirements of EGGenTDurchfG and the VLOG Standard).

**Operating unit:** Parts of an agricultural business which are completely separate from each other, except for their organisation. This may apply for, e.g., different barns or storage sites for feed.

For agricultural businesses in Germany, parts of such a business that are assigned a VVVO number are generally defined as an operating unit.

**Other substances within the meaning of Sec. 3a (5) EGGenTDurchfG:** Substances within the meaning of Sec 5 (2), Food Labelling Regulation (LMKV) in the version dated 18 December 2007.

**Outsourcing:** Takes place if the outsourcing laboratory is not accredited for the parameter and outsources GMO testing to another laboratory.

**Plant-based production:** The cultivation of primary products, including harvesting and foraging.

**Positive test result:** Any test result that confirms the presence of GMOs in feed, raw materials or products (regardless of the amount of GMO content). A positive test result does not automatically result in exclusion of the goods from “VLOG” production/marketing. The applicable limit values and conditions of EU Regulations 1829/2003 and 1830/2003 and EGGenTDurchfG must be followed for this classification (cf. Chapter A 8).

**Private Labelling (feed):** Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the client's (private labeller) specifications or the goods are purchased from the client and sold in Private Labeller's name.

**Processed product:** Food which has been produced from unprocessed products; these products may contain ingredients that are necessary for their production or for imparting special qualities.

**Processing:** A substantial modification of the initial product, e.g., through heating, smoking, curing, ripening, desiccating, marinating, extracting, extruding, or through a combination of these different procedures (Regulation (EC) No. 852/2004).

**Products (food):** All substances or products that are intended for, or which in reasonable discretion can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

**Raw materials/products not subject to compulsory labelling:** Food which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, is not subject to compulsory labelling as “genetically modified”.

**Raw materials/products subject to compulsory labelling:** Food which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, is subject to compulsory labelling as “genetically modified”.

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

**Retail:** Handling and/or processing of food and its storage at the point of sale or delivery to consumers, including shops, supermarket distribution centres and wholesale outlets.

**Risk (within the meaning of the Standard):** The probability of the occurrence of damage or nonconformity (legal or with regards to the standard) to “Ohne Gentechnik” food or “VLOG geprüft” feed

**Risk-prone feed:** Feed that has a higher risk of GMO contaminations due to the cultivation situation of the plant species, origin, processing and/or supply chain. In accordance with the VLOG Standard, their compliance must be ensured by monitoring through GMO testing or a VLOG certificate.

- In the Feed Stage, feed is graded into risk-prone feed on the basis of a risk assessment of the feed business (cf. Chapter C 3.3).
- For the Agriculture Stage, Chapter E 4.2 defines risk-prone feed.

**Shipping company:** See Carrier.

**Site:** A site is defined as all premises and buildings of a business at a given postal address. Examples of an address are “Bahnhofstrasse 3a” or “Wiesengrund 1-5”.

**Small agricultural operation:**

- The main production focus is on milk, with a dairy herd of less than 40 lactating animals.
- The main production focus is on eggs, with less than 10,000 animals.
- The main production focus is on broiler chicken, with less than 16,000 fattening places.
- The main production focus is on fattening pigs, with space for less than 600 animals.
- Or a facility, independent of the main product and number of animals, with not more than 1 fulltime employee (at least 38 hrs/week) other than the facility manager and any members of the manager's family.

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

[https://www.ohnegentechnik.org/fileadmin/user\\_upload/01\\_unternehmen/e\\_standards/e1\\_der\\_vlog\\_standard/Further\\_Documents/Standards\\_recognised\\_as\\_equivalent.pdf](https://www.ohnegentechnik.org/fileadmin/user_upload/01_unternehmen/e_standards/e1_der_vlog_standard/Further_Documents/Standards_recognised_as_equivalent.pdf)

**Stationary Grinding and Mixing Facilities:** Facilities existing in the operation and used exclusively within the operation.

**Storage:** The service of temporary storage of food and/or feed.

**Subcontracting:** Subcontracting means that the laboratory itself is accredited for this parameter, but due to special circumstances such as a lack of laboratory employees or resources, it assigns this parameter to another laboratory accredited for said parameter.

**Supplementary feed:** Compound feed having a high content of certain substances, but the composition of which makes it suitable for the daily ration only in combination with other feeds.

**Supplier:** The business from which the goods are bought. This can be, for example, the manufacturer or dealer.

**Swappable or non-swappable GM feed/raw materials:** GM feeds are swappable if their use, by their nature, would also be feasible in “Ohne Gentechnik” production; e.g. GM soy meal in pig fattening and “Ohne Gentechnik” milk production. Feed is non-swappable if clearly assigned to a production line and their use in “Ohne Gentechnik” production is highly unlikely; e.g. GM milk replacers for calf rearing and “Ohne Gentechnik” milk production.

**Trading:** Trading comprises all activities within the scope of which goods are sold – i.e. not produced at one's own facilities – and resold. In contrast to drop shipping, the trader takes physical possession of the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).

**Transport:** Transport means conveying goods from one place to another.

**Unannounced audit:** An audit of a retail branch conducted by the certification body without prior notice.

**VLOG Agriculture group:** A VLOG Agriculture Group is a combination of at least two agricultural businesses/sites (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture. Group certification is available for a business with at least two sites as well as for the joint certification of multiple businesses with their sites.

**VLOG animals/VLOG animal categories:** Animals or animal groups suitable for “Ohne Gentechnik” labelling of the food produced from them, and which are from agricultural businesses which

- Are either themselves certified according to the VLOG Standard for animals or meat, or
- Are covered by a group organisation according to the VLOG Standard for animals or meat.

**VLOG certificate:** Confirmation of successful compliance with the VLOG Standard issued by a certification body recognised by VLOG.

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

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

**“VLOG” raw materials, products:** Raw materials and products that are certified in accordance with the VLOG Standard and can be used in the “Ohne Gentechnik” process.

**VLOG retail group:** A VLOG Retail Group is a combination of branch operations (the so-called group members) for the purpose of VLOG group certification in retail.

**VLOG Standard:** “Ohne Gentechnik” Production and Certification Standard as amended from time to time.

**Young cattle:** Cattle offspring aged 7 to 12 months.

# Annexes

## Part 1 Suppliers' Declarations

- (1) GMO-Free Certificate
- (2) Certificate for "Ohne Gentechnik" Compliant Feeding of Animals
- (3) Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)

## Part 2 Analytics

- (4) Sampling Log
- (5) *repealed*
- (6) *repealed*
- (7) Reduction of the Scope of Testing after Changing Feed in Group Organisations

## Part 3 Certification

- (8) *repealed*
- (9) *repealed*
- (10) Dealing with Deviations and Breaches
- (11) VLOG Certificate Template
- (12) Areas of Application of VLOG Certification

## Part 4 Audit Documents

- (13) Facility Description Logistics
- (14) Checklist Logistics
- (15) Facility Description Feed Manufacturing
- (16) Checklist Feed Manufacturing
- (17) Facility Description Mobile Grinding and Mixing Facilities
- (18) Matrix Description and List of Sites
- (19) Checklist Matrix Organisation
- (20a) Facility Description Agriculture
- (20b) Facility Description Agriculture Beekeepers
- (20c) Facility Description Animal Transport/Livestock Trade
- (21) *repealed*
- (22a) Checklist Agriculture including Beekeepers
- (22b) Checklist Animal Transport and Livestock Trade
- (23) Group Description Agriculture including Members List
  - (23a) Members List
  - (23b) Members Lists laying hens
  - (23c) Transmission of Stable Spaces
  - (23d) Evaluation/Overview Test Results
  - (23e) Data Release Statement
- (24) Checklist Group Organisation
- (25) Facility Description Food Processing/-Preparation
- (26) Checklist Food Processing/-Preparation
- (27) Group Description Retail – Bulk Goods
- (28) Checklist Retail – Bulk Goods (Headquarters)
- (29) Checklist Retail - Bulk goods (Branch)

## Part 5 Protocols and Confirmations

- (30) Grinding and Mixing Protocol
- (31) VLOG Incident Sheet Feed Manufacturing and Logistics
- (32) VLOG Incident Sheet Matrix Organiser
- (33) VLOG Incident Sheet Agriculture and Animal Trade
- (34) VLOG Incident Sheet Agricultural Group Organisation
- (35) VLOG Incident Sheet Food Processing/Preparation, Logistics and Retail

## Data protection & Privacy

VLOG undertakes to handle the personal data of its contracting partners carefully and in accordance with the data protection provisions of the German Data Protection Act (DSG) and the General Data Protection Regulation (GDPR). The persons responsible for data processing at VLOG comply with all required technical and organisational measures to ensure data security. Personal data of which VLOG becomes aware in the course of the contractual relationships is processed exclusively in order to discharge this contractual relationship. The following data categories are processed:

- Master data (e.g. name, address, contact information, legal representatives, company domicile)
- Operational data
- Contract data
- Correspondence

VLOG only processes and stores personal data for as long as necessary in order to fulfil the contractual obligations. After the obligations have lapsed, the data is blocked or deleted.

Statutory retention obligations may apply additionally, such as retention obligations under commercial or tax law (e.g. Commercial Code, Tax Code). Insofar as such retention obligations apply, the data is blocked or deleted at the end of these obligatory retention periods.





# **“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
<b>Change of risk category</b>	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).

<b>Site/ operating unit</b>	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.
<b>Additional criteria for facilities that have hitherto been organised into a VLOG group or certified:</b>	
<b>Previous on-site audit by the certification body</b>	The group member was already audited on site by a VLOG-recognised certification body.
<b>Data approval by the previous group organiser</b>	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 business<sup>1</sup> 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](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):

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<sup>1</sup> 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
<b>GMO feed within the business</b>	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> <li>No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site.</li> <li>Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.</li> </ul>	<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 site<sup>2</sup>.</p>
<b>Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn</b>	<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>
<b>Certification status of risk-prone feed used in VLOG production (cf. Chapter E 4.2)</b>	<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>

<sup>2</sup> 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).
<b>Use of grinding and/or mixing facilities</b>	<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"> <li>• The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio<sup>3</sup>).</li> <li>• Measures to prevent contaminations with GMO are described in the QM manual of the facility operator.</li> </ul>	<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>
<b>Animal transport/livestock trade</b>	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

<sup>3</sup> 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
<b>Individual certification</b>			
<b>Logistics</b>		Once per calendar year	
<b>Feed manufacturing</b>		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).
<b>Agriculture</b>	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	<p>Supplement – Animal transport/livestock trade sub-stage</p> <p>If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit under the following conditions:</p> <ul style="list-style-type: none"> <li>• Direct transport from the supplier to the buyer (e.g., the abattoir), without intermediate stabling and/or feeding</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Food Processing and Preparation</b>		Once per calendar year	
<b>Matrix Organisation in Logistics and Feed Manufacturing</b>			
<b>Matrix organiser</b>		Once per calendar year	
<b>Matrix site</b> <b>Logistics and Mobile Grinding and Mixing Facilities Stages</b>		Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
<b>Matrix site</b> <b>Feed Manufacturing stage (except for mobile grinding and/or mixing facilities)</b>		Once per calendar year	
<b>Agricultural Group Organisation</b>			
<b>Group organiser</b>		Once per calendar year	
<b>Group member risk category 0</b>		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
<b>Group member risk category 1</b>	Within 2 calendar years	i.e. at the latest in the second following calendar year of the last audit
<b>Group member risk category 2</b>	Once per calendar year	
<b>Combination of individual certification and group certification in agriculture or combination of multiple group certifications with various areas of application per business:</b>		
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).		
<b>Group Organisation Retail</b>		
<b>Group organiser</b>	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.
<b>10% of the group members if centrally purchased, traceability up until sale to the customer must be ensured</b>	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.
<b>10% of the group members if centrally purchased, traceability up until the service counter must be ensured</b>	Once per calendar year	The audit is unannounced.
<b>100% of the group members if products are purchased locally</b>	Once per calendar year	

Stage	Audit frequency of routine audits	Specific requirement/note
<b>External Service Providers</b>		
<b>External service providers that are audited as part of the VLOG audit of the client</b>	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 certification<sup>4</sup>

### 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

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<sup>4</sup> 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
<b>A</b>	Full compliance with a requirement	10 points	
<b>B</b>	Minor to moderate deviations from the requirement	5 points	
<b>C</b>	Non-compliance or major deviation from the requirement	-10 points	
<b>KO</b>	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.
<b>N.A.</b>	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"> <li>more than 75% of the maximum points</li> <li>No KO grading</li> </ul>	passed	<ul style="list-style-type: none"> <li>Issuance of the VLOG certificate or inclusion in the VLOG group or VLOG matrix</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<u>Only for document audit (expansion certification in agriculture)</u> <ul style="list-style-type: none"> <li>No KO grading</li> <li>“A” grade for the facility description requirement</li> </ul>	passed	<ul style="list-style-type: none"> <li>Issuance of the VLOG certificate or inclusion in the VLOG group</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>less than 75% of the maximum points</li> <li>No KO grading</li> </ul>	not passed	<ul style="list-style-type: none"> <li>Within process of initial certification: No issuance of a VLOG certificate or inclusion in a VLOG group or VLOG matrix</li> <li>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</li> <li>A new routine audit must be performed</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
		<ul style="list-style-type: none"> <li>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)</li> </ul>	
<ul style="list-style-type: none"> <li>One or more KO gradings</li> </ul>	not passed	<ul style="list-style-type: none"> <li>No issuance of a VLOG certificate or inclusion in the VLOG group or VLOG matrix</li> <li>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</li> <li>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</li> <li>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.</li> <li>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)</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul>

**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>
<b>Group Organisation - Agriculture, Group Organisation - Retail</b>
<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"> <li>For stage group organisation agriculture with the defined scope of applicability of animal production (cf. Annex (12)).</li> <li>For stage retail with the defined scope of applicability of bulk products (cf. Annex (12)).</li> </ul> <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><b>i</b> <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](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

<b>All stages</b>
<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><b>Feed Manufacturing Stage</b></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"> <li>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).</li> </ul>
<p><b>Agriculture Stage</b></p> <p><u>Individual VLOG-certified businesses:</u></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <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"> <li>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).</li> </ul>

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.





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

## **Part B - Logistics**

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## Part B: Logistics

This part of the Standard describes the requirements for the Logistics Stage of food and feed and its sub-stages. The requirements for the livestock trade and animal transport are assigned to the Agriculture Stage (Part E). Part Z (Certification) describes the certification process, risk grading (if necessary) and the resulting requirements for (future) VLOG-certified businesses.

### B 1 Stage Definition and Mandatory Certification

VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG-certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found at <https://www.ohnegentechnik.org/SRAE>.

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Sub-stage Transport:</b> Transport means conveying goods from one place to another.			
Feed/Food	<p>For transport of bulk “VLOG geprüft” feed and/or bulk VLOG-certified food/ingredients between VLOG-certified businesses, provided that at least one of the following conditions is met:</p> <ul style="list-style-type: none"> <li>Transport is <u>not</u> integrated into the risk management of a VLOG-certified business.</li> <li><u>No</u> agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the carrier and the certified business.</li> </ul>	<p>For the transport of bulk “VLOG geprüft” feed and/or bulk VLOG-certified food (ingredients) between VLOG-certified businesses, provided that all of the following three conditions are met:</p> <ul style="list-style-type: none"> <li>Order placed by a VLOG-certified business</li> <li>Transport is integrated into the risk management of a VLOG-certified business. There is adequate proof of integration.</li> <li>An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the carrier and the certified business. (cf. Chapter B 2.5)</li> </ul>	B 1 - B 2

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
		For the transport of sacked/tamper resistant packaged “VLOG geprüft” feed and/or VLOG-certified food.	B 1 - B 2
		For the transport of bulk VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2
<b>Sub-stage Storage/handling:</b> Storage comprises the service of temporary storage of food and/or feed. Handling comprises all services, directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).			
Feed	For storage/handling of bulk “VLOG geprüft” feed	For storage/handling of bagged/tamper resistant packaged feed	B 1 - B 3
Food	For storage/handling of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of contamination or tampering.	For storage/handling of bulk, VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 3
<b>Sub-stage Trading:</b> Trading comprises all activities within the scope of selling and reselling goods that are not produced at one's own facilities. In contrast to drop shipping, the trader takes physical possession of the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).			
Feed	For traders, that want to label bulk feed, that is already VLOG-certified, as “VLOG geprüft”* on the bills of lading.	For trading of bagged/tamper resistant packaged feed (except for private labelling).	B 1 - B 2, B 4
	For traders, that want to convert non-VLOG-certified feed material into “VLOG geprüft” quality and label it as such*.		B 1 - B 2, B 4 resp. B 5, B 6

	<b>Certification required according to VLOG Standard</b>	<b>Certification not required according to VLOG Standard</b>	<b>Standard requirements</b>
	For traders, that sack and label bulk “VLOG geprüft”* feed material, and that also want to designate it as “VLOG geprüft” on labels, declarations or bills of lading.		
	Mobile grinding and/or mixing facilities: Trading/sale of “VLOG geprüft” oil by a grinding and/or mixing facility, if this oil is used for dust control in the grinding and/or mixing facility and the grinding and/or mixing facility is not VLOG-certified.	Mobile grinding and/or mixing facilities: Trading/sale of “VLOG geprüft” oil by a grinding and/or mixing facility, if this oil is used for dust control in the grinding and/or mixing facility and the grinding and/or mixing facility is VLOG-certified.	B 1 - B 2, B 4
Food	For trading of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of contamination or tampering.	For trading of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2, B 4
	For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that: <ul style="list-style-type: none"> <li>• The trader issues delivery slips of its own for certified goods with the “VLOG” label and/or</li> <li>• The trader commissions non-VLOG-certified carriers or the transport site is <u>not</u> included in the risk management of a VLOG-certified business</li> </ul>	For trading of sealed VLOG-certified food between two VLOG-certified businesses, provided that all of the following conditions are met: <ul style="list-style-type: none"> <li>• The goods are VLOG certified</li> <li>• The originating processing business is listed on the delivery slips</li> <li>• The certified goods are labelled “VLOG” on the delivery slip</li> <li>• The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1. There is adequate proof of integration.</li> </ul>	B 1 - B 2, B 4

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
		<ul style="list-style-type: none"> <li>After loading, the vehicle tank, container, etc. is sealed</li> </ul>	
		For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.	
		For trading of sacked/tamper resistant packaged food.	
<b>Sub-stage Drop shipping:</b> Drop shipping refers to the trading method wherein the goods are transported directly from the supplier to the customer of the drop shipper. The drop shipper does not take physical possession of the goods, but has a contractual relationship with the customer and issues the invoice for the goods.			
Feed	For drop shipping of bulk “VLOG geprüft” feed	For drop shipping of bagged/tamper resistant packaged feed (except for private labelling).	B 1 - B 2, B 5
	For drop shippers, who want to convert non-VLOG-certified feed material into “VLOG geprüft” quality and label it as such*.		B 1 - B 2, B 5, B 6
Food	For drop shipping of bulk VLOG-certified food/ingredients.	For drop shipping of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2, B 5
	For sealed drop shipping of VLOG-certified food between two VLOG-certified businesses, provided that:	For drop shipping of sealed VLOG-certified food between two VLOG-certified food businesses, provided that all of the following conditions are met: <ul style="list-style-type: none"> <li>The goods are VLOG certified</li> </ul>	B 1 - B 2, B 5

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	<ul style="list-style-type: none"> <li>The drop shipper issues delivery slips of its own for certified goods with the “VLOG” label and/or</li> <li>The drop shipper commissions non-VLOG-certified carriers or the transport is not included in the risk management of the VLOG-certified business that commissions the transport</li> </ul>	<ul style="list-style-type: none"> <li>The originating processing business is listed on the delivery slips</li> <li>The certified goods are labelled “VLOG” on the delivery slip</li> <li>The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1. There is adequate proof of integration.</li> <li>After loading, the vehicle tank, container, etc. is sealed by employees of the issuing processing business</li> </ul>	
	<p>For drop shipping of bulk VLOG-certified food with direct transport from the VLOG-certified agricultural business to the VLOG-certified buyer (e.g., by milk tanker), provided that at least one of the following conditions is not met:</p> <ul style="list-style-type: none"> <li>The goods are <u>not</u> VLOG certified</li> <li>The purchasing processing facility <u>cannot</u> verify that the goods exclusively come from VLOG-certified businesses</li> <li>The processing facility does <u>not</u> have currently valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)</li> </ul>	<p>For drop shipping of bulk VLOG-certified food with direct transport from the VLOG-certified agricultural business to the VLOG-certified buyer (e.g., by milk tanker), provided that all of the following conditions are met:</p> <ul style="list-style-type: none"> <li>The goods are VLOG certified</li> <li>The purchasing processing facility can verify, based on available information/documentation, that the goods exclusively come from VLOG-certified businesses (e.g., verifiable tour)</li> <li>The processing facility has currently valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)</li> <li>The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in</li> </ul>	B 1 - B 2, B 5



	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	<ul style="list-style-type: none"> <li>The carrier is <u>not</u> VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1.</li> </ul>	accordance with B 1. There is adequate proof of integration.	
		For drop shipping of sacked/tamper resistant packaged VLOG-certified food/ingredients (e.g., as soon as they have been packaged in end consumer packaging).	
<b>Sub-stage Private labelling of feed:</b> Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the client's (private labeller) specifications or the goods are purchased from the-client and sold in the Private Labeller's name.			
Feed	For businesses, that operate as private labellers for bagged and/or bulk feed and market/label the feed as "VLOG geprüft"*.	For businesses that operate as private labellers for feed and do not market/label the feed as "VLOG geprüft".	B 1 - B 2, B 7

Table B 1: Stage Definition and Mandatory Certification

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

## B 2 General Requirements

### B 2.1 Standard Usage Agreement with VLOG

For individually certified businesses 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.

### B 2.2 Facility Description

The facility description (Annex (13)) is on file and up-to-date.

The certification body and, in case of matrix organisations, the matrix organiser are promptly informed about major changes pertaining to VLOG certification.

**i** *Explanation: Information transmitted in electronic form will be accepted. The up-to-date facility description, annexes (VLOG templates or own documents with equivalent content) and the documents and test results listed therein must be submitted to the auditor for viewing. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. The up-to-date facility description and the documents specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG. Major changes pertaining to VLOG certification are, e.g., change of products and/or processes.*

**i** *Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.*

### B 2.3 Assignment of Responsibilities, Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

**i** *Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.*

### B 2.4 Risk Management (KO)

#### Risk analysis

A documented risk analysis has been created for all relevant feed, raw materials, products, procedures and processes, including risk evaluation for “Ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and feed for the “VLOG geprüft” and/or “Ohne Gentechnik”/“VLOG” area (e.g. countries of origin)
- Handling of feed, raw materials and products that meet the requirements for “VLOG”/“Ohne Gentechnik” or “VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “Ohne Gentechnik” or “VLOG geprüft” labelling
- 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.

## **B 2.5 Commissioning External Service Providers**

External service providers may be commissioned for activities requiring certification (cf. B 1 Logistics, C 1 Feed Manufacturing, G 1 Food Processing/Preparation) in the areas of production, transport, storage, handling and/or (drop) 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 B 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 B 2.4).

## **B 2.6 Segregation of Goods Flows/Exclusion of Commingling Contamination (KO)**

The physical and/or temporal separation of goods flows ensures that at no time feed, raw materials or products that are not suitable for “VLOG geprüft” or “VLOG”/“Ohne Gentechnik” labelling comes into contact with the goods flow for feed, raw materials or products with “VLOG geprüft” or “VLOG”/“Ohne Gentechnik” labelling. Suitable procedural steps are to be in place to ensure that the contamination by GMO or non-compliant feed, raw materials and/or products is reduced to an at least adventitious and technically unavoidable level. In addition, all feed, raw materials and products must be clearly and consistently labelled in all process steps.

Transport vehicles are to be verifiably cleaned at least in the dry.

## **B 2.7 Handling of Non-Compliant Feed, Raw Materials and Products (KO)**

An effective and documented procedure for handling non-compliant feed, raw materials and products is to be in place. At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter B 2.12)
- Labelling of affected feed, raw materials and products
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, 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 B 4.2.4.



*Explanation: Non-compliant feed, raw materials and products can be identifiable, e.g. based on positive test results.*

## **B 2.8 Outgoing Goods Control, Labelling on Bills of Lading**

### **Feed**

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging using the word mark “VLOG geprüft” and/or the “VLOG geprüft” seal (cf. Chapter A 10). It must be clearly evident to which feed item the labelling refers.

When using the word mark, care must be taken to avoid any resemblance of its visual representation to the “VLOG geprüft” seal.



*Explanation: VLOG recommends the following wording for the declaration of feed that is exempt from mandatory labelling but is not VLOG-certified:*

*“The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”*

### **Food**

VLOG-certified raw materials and products must be clearly labelled on all bills of lading using the wording “VLOG” and/or the “Ohne GenTechnik” Seal.

It must be clearly evident to which raw material or product the labelling refers.

If no bills of lading are generated in specific systems (e.g. milk collection), a clear contractual stipulation for the delivery must ensure the above-listed labelling.

Only feed, raw materials and products that meet the requirements for “VLOG geprüft” or “VLOG” labelling may be labelled as such.



*Explanation: VLOG recommends the following wording for labelling food items that meet the requirements of the EGGenTDurchfG, but are not included in the VLOG certification of the business: “Ingredient suitable for the production of “Ohne Gentechnik”-labelled food.”*

## **B 2.9 Traceability (KO)**

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed or “VLOG” raw materials and products present in the business can be clearly identified at all times.
- The goods flow of “VLOG geprüft” feed or “VLOG” raw materials and products as well as quantity lists and evaluations can be generated within one working day to allow 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/done*
- *Information on delivery date and supplied customers*

## **B 2.10 Complaint Management**

A documented system must be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. They are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

## B 2.11 Goods Recall

An effective and documented procedure for goods recall, including determination of responsibilities, is to be in place for non-compliant feed or raw materials according to the VLOG Standard.

## B 2.12 Crisis Management (KO)



*Explanation: Incidents are defined on the incident sheet (cf. Annexes (31) and (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 “VLOG geprüft” feed or “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
- Provision requiring immediate notification of
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (31) or (35))
  - the VLOG Head Office using the VLOG Incident Sheet (see Annex (31) or (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.

## B 2.13 Corrective Action, Ongoing Improvement Process

If non-compliant feed, raw materials and 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.

## B 2.14 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents in connection with “VLOG geprüft”/“VLOG” transport, handling, (drop) shipping or “VLOG geprüft”/“VLOG” storage or labelling with the “VLOG geprüft”/“Ohne GenTechnik” seal must be retained for at least the following period of time, unless legal requirements provide for 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 delivery slips/protocols, clearance certificates, training documents etc. In accordance with the Guideline for Monitoring GMOs in Feed, feed- (regarding GMO) related documents must be retained for five years.*

## **B 2.15 Staff Training**

All staff members involved in securing the operating procedures of relevance to “VLOG geprüft” or “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 is to 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 guided by the responsibility of the staff member for the proper flow of the “VLOG geprüft” or “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\\_trainig](https://www.ohnegentechnik.org/staff_trainig)*

## **B 2.16 Internal Audits**

Each calendar year, the business must perform internal audits that at a minimum cover the general and business specific Standard requirements of the Logistics 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.

# **B 3 Specific Requirements for Storage and Handling**

## **B 3.1 Incoming Goods Inspection (KO)**

### **Feed**

The bills of lading or in the case of packed goods the packaging are to be checked for the “VLOG geprüft” label or “VLOG geprüft” seal within the scope of incoming goods inspection.

### **Raw materials (food)**

The bills of lading are to be checked for the “VLOG” label or “Ohne GenTechnik” seal within the scope of incoming goods inspection.

## B 4 Specific Requirements for Trade

### B 4.1 Incoming Goods Inspection (KO)

Within the scope of the incoming goods inspection of VLOG-certified raw materials, products and feed

- the bills of lading or in the case of packed goods the packaging must be checked for the identification “VLOG geprüft” and/or the “VLOG geprüft” seal or “VLOG” and/or the “Ohne GenTechnik” seal.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

A complaint is to be issued to the supplier for an incomplete bill of lading. The feed or raw materials may be marketed as “VLOG geprüft” and/or “VLOG” only if this quality has been verifiably confirmed by the VLOG-certified supplier.

### B 4.2 Sampling and Testing

Feed and/or raw materials and products that are relevant for the “VLOG geprüft”/“VLOG” trade are subject to risk-based sampling and GMO testing in accordance with the following specifications.

#### B 4.2.1 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 Chapters 7, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification).
- Frequency and periods of sampling and GMO testing
- Description of the test procedure (commissioned laboratory, scope of testing cf. [Guideline for Laboratories](#))

Sampling and GMO testing will not be required if the traded feed and/or raw materials/products cannot be tested for genetic engineering for technical reasons. In this case the sampling and test plan must provide for a risk analysis that concludes which feed/raw materials/products do not need to be sampled or tested.



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



### B 4.2.2 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 processed in a VLOG-recognised laboratory.

The client for the GMO testing must check the VLOG recognition of the commissioned laboratory regularly, at least once per calendar year.

When commissioning a laboratory, the following information must be indicated in the order or other documents having similar effect, and submitted to the laboratory:

- GMO testing order according to VLOG requirements
- Composition of the sample:
  - If containing soy, maize/corn, rapeseed/canola and/or rice feed material or ingredients, it must be indicated in what form these are contained (e.g. maize/corn as maize/corn flour, soy as soy extraction meal). Copies of the composition/declarations are to be sent to the laboratory along with the samples.



*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.*

### B 4.2.3 Frequency of Sampling and Testing

Each calendar year, the sampling and testing frequency in the business must at least follow the specifications listed in Table B 2 and Table B 3.

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).

**Trading of VLOG feed**

List of all products at the site	Minimum sampling + testing in “VLOG geprüft” outgoing goods inspection <sup>12</sup> per calendar year	
	Bulk “VLOG geprüft” feed	VLOG bagged goods
No bulk feed subject to compulsory labelling at site	up to, including 10,000 t/year: 1 > 10,000 to 50,000 t/year: 2 > 50,000 to 100,000 t/year: 4 > 100,000 to 200,000 t/year: 6 > 200,000 to 300,000 t/year: 8 for every additional 100,000 t or part thereof: 2 additional	None
Feed subject to compulsory labelling at site	up to, including 2,000 t/year: 1 > 2,000 to 5,000 t/year: 3 > 5,000 to 10,000 t/year: 5 > 10,000 to 50,000 t/year: 10 > 50,000 to 100,000 t/year: 15 > 100,000 to 200,000 t/year: 20 > 200,000 to 300,000 t/year: 25 for every additional 100,000 t or part thereof: 5 additional	None

Table B 2: Minimum of sampling and testing at the Trading of Feed sub-stage per calendar year

**Trading of VLOG food (raw materials/products):**

List of all bulk raw materials/products handled at the site <sup>3</sup>	Minimum number of samples + tests of outgoing VLOG goods per calendar year
bulk “Ohne Gentechnik” raw materials/products	2
bulk “Ohne Gentechnik” raw materials/products + bulk raw materials/products not subject to mandatory labelling but not “Ohne Gentechnik” compliant	6
bulk “Ohne Gentechnik” raw materials/products + raw materials/products subject to mandatory labelling	12

Table B 3: Minimum sampling + testing at the Trading of Food sub-stage per calendar year



*Explanation: The number of samples (raw materials/products) 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 B3.*

<sup>1</sup> All feed quantities relate exclusively to “VLOG geprüft” feed or feed that is to be labelled as “VLOG geprüft”.

<sup>2</sup> The sampling and testing obligation applies only to traders that store feed on site (or have external service providers store it). If the trader only engages in trading and transport without (intermediate) storage, it is not necessary to test outgoing goods.

<sup>3</sup> Raw materials/products packed in tamper-proof packaging need not be tested

### B 4.2.4 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.

#### Feed:

Evaluation		Actions
GMO not verifiable or < 0.1%		
Labelling compliant, permissible for VLOG-production		No action needed
≥ 0.1 % ≤ 0.9 % GMO		
Case-by-case evaluation	Can the GMO contamination be traced back to your own business? (e.g., dual use)	<u>Yes</u> : Check whether the actions taken (cf. Chapter B 2.4) are adequate and properly implemented.  - If not, take further action in accordance with Chapters B 2.7 and B 2.12
		<u>No</u> : Inform suppliers.
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	<u>Yes</u> : The actions taken (cf. Chapter B 2.4) are not adequate and must be revised.
		<u>No</u> : (No systemic cause): No action needed.
> 0.9 % GMO		
Not labelling compliant, not permissible for VLOG production		Take further action in accordance with the procedures established in Chapters B 2.7 and B 2.12

Table B 4: Evaluation of test results for feed

**Food:**

Evaluation	Actions
<b>GMOs not verifiable or <math>\leq</math> limit of detection (generally 0.1% GMO)</b>	
Labelling compliant, permissible for VLOG production	No action needed
<b>&gt; Limit of detection (generally 0.1% GMO)</b>	
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in Chapter G 2.8 and G 2.13

Table B 5: Evaluation of test results for food

## B 5 Specific Requirements for Drop Shipping

### B 5.1 Incoming Goods Inspection (KO)

When “VLOG” raw materials/products or “VLOG geprüft” feed are drop shipped, the supplier’s VLOG certification is to be regularly checked, at least once per calendar year.

## B 6 Specific Requirements for Conversion of Feed to “VLOG geprüft”

This chapter governs the conversion of feed material which is not subject to compulsory labelling, to “VLOG geprüft” quality. Conversion is only feasible for feed material that can be tested for GMOs. It applies exclusively in combination with the requirements for traders (cf. Chapter B 4) or drop shippers (cf. Chapter B 5)

### B 6.1 Specific Requirements for Risk Management

In addition to the requirements in Chapter B 2.4, the risk analysis requires the following:

- Risk grading of feed material (risk-prone/not risk-prone) for the “VLOG geprüft” area
- Additionally, in the case of drop shipping: No later than at the conclusion of a purchase agreement by the drop shipper and the supplier, the drop shipper must have a written confirmation from the supplier that the goods are not subject to compulsory GMO labelling (which must be batch-specific or for a specific period of time)



*Explanation: The document “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: [https://www.ohnegentechnik.org/risk-prone\\_feed](https://www.ohnegentechnik.org/risk-prone_feed).*

## B 6.2 Sampling and Testing for Conversion

The requirements of Chapter B 4.2 (B 4.2.1 Sampling and Testing Plan, B 4.2.2 Sampling and Commissioning a Laboratory, B 4.2.4 Evaluation of Test Results) are to be performed.

The business must perform sampling and testing with at least the frequency indicated in Table B 6 each calendar year.

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

<b>List of all products at site</b>	<b>Area</b>	<b>Sampling + testing at “VLOG geprüft” incoming goods</b>	<b>Minimum sampling + testing in “VLOG geprüft” outgoing goods inspection (trade incl. conversion) per calendar year</b>
<b>No bulk feed subject to compulsory labelling at site</b>		For every batch of risk-prone feed material that is to be converted	up to, including 10,000 t/year: 1 > 10,000 to 50,000 t/year: 2 > 50,000 to 100,000 t/year: 4 > 100,000 to 200,000 t/year: 6 > 200,000 to 300,000 t/year: 8 for every additional 100,000 t or part thereof: 2 additional
<b>Bulk feed subject to compulsory labelling at site</b>		For every batch of risk-prone feed material that is to be converted	up to, including 2,000 t/year: 1 > 2,000 to 5,000 t/year: 3 > 5,000 to 10,000 t/year: 5 > 10,000 to 50,000 t/year: 10 > 50,000 to 100,000 t/year: 15 > 100,000 to 200,000 t/year: 20 > 200,000 to 300,000 t/year: 25 for every additional 100,000 t or part thereof: 5 additional
<b>Exclusive drop shipper or shipper who only transports the goods but does not store or tranship them</b>		For every batch of risk-prone feed material that is to be converted: 1  If soy, rapeseed/canola, corn/maize, sugar beets or cotton are converted and all lots are graded as non-risk-prone, the following applies: Monitoring with at least one sampling + test per year. The exact number is to be determined by the business based on risk (e.g., depending on the number of suppliers and countries of origin.	

**Table B 6: Minimum number of samples + tests for incorporation into “VLOG geprüft” quality of feed material not subject to compulsory labelling per calendar year**

## **B 7 Specific Requirements for Private Labelling of Feed**

### **B 7.1 Certification Status of Contract Manufacturers (KO)**

Contract manufacturers are monitored as follows:

- contract manufacturer certification for all activities subject to certification under VLOG or a standard recognised as equivalent (to be checked at least once per calendar year) or
- on-site auditing of contract manufacturers as part of a VLOG audit of the private labeller by its certification body for all relevant activities (cf. Chapter B 2.5).

### **B 7.2 Contractual Agreement between Private Labeller and Contract Manufacturer (KO)**

The private labeller and the contract manufacturer maintain a written agreement, which specifies which VLOG production processes and tasks are the responsibility of the private labeller and which are those of the contract manufacturer. The agreement must list all process steps from procurement of raw materials to shipping.

If the contract manufacturer is not VLOG-certified, there must be an agreement and auditing in accordance with Chapter B 2.5.

If the contract manufacturer has its own VLOG certification, the agreement must state that the contract manufacturer must promptly notify the private labeller if the certification becomes invalid.

### **B 7.3 Incoming Goods Inspection**

If the private labeller (temporarily) takes physical possession of the manufactured feed, the incoming goods inspection must ensure that all “VLOG geprüft” feed meets the requirements of the VLOG Standard.

Within the scope of the incoming goods inspection of VLOG-certified feed:

- the bills of lading or in the case of packed goods the packaging must be checked for the identification “VLOG geprüft” and/or the “VLOG geprüft” seal.

### **B 7.4 Sampling and Testing**

If the private labeller (temporarily) takes physical possession of bulk goods, the “VLOG geprüft” feed must be subjected to risk-based sampling and GMO testing in accordance with Chapter B 4.2.



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

## **Part C - Feed Manufacturing**

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## Part C: Feed Manufacturing

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

### C 1 Stage Definition and Mandatory Certification

VLOG recognises various certifications as equivalent to certification according to the VLOG “Ohne Gentechnik” Production and Certification Standard. No additional VLOG-certification is needed for the respective product/feed or service if it is certified under one of these standards. A list of the recognised standards can be found at <https://www.ohnegentechnik.org/SRAE>.

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Sub-stage Feed manufacturing/processing:</b> All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc. If a feed manufacturer also operates as a private labeller, the respective requirements of Part B must be met in addition to the requirements of Part C.			
All types of feed	For bulk and/or bagged/package feed, produced in the business, that intended to be advertised/labelled as “VLOG geprüft”*.	For bulk and/or bagged/package feed, produced in the business that is <u>not</u> intended to be advertised/labelled as “VLOG geprüft”.	C 1 - C 3
<b>Sub-stage Mobile grinding and mixing facility:</b> Commercial, multi-operation production of feed using mobile equipment in agricultural businesses.			
Grinding/ mixing of feed	For the grinding and/or mixing of feed that is to be advertised/labelled as “VLOG mixture”. Certification in this area also covers the trading/sale of oil used for dust control in the grinding and/or mixing facility.	For the grinding and/or mixing of feed that is <u>not</u> to be advertised/labelled as “VLOG mixture”.	C 1- C 2, C 4
<b>Transport, storage and handling as a service, trading and drop shipping (including conversion of feed, if any) as well as Private Labelling of feed are at the Logistics stage (Part B).</b>			

Table C 1: Stage definition and mandatory certification

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

## C 2 General Requirements

### C 2.1 Standard Usage Agreement with VLOG

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

### C 2.2 Facility Description

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

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

**i** *Explanation: Information transmitted in electronic form will be accepted. For the audit, the current facility descriptions, annexes (VLOG templates or own documents with equivalent content) and documents listed therein are to be submitted to the auditor for viewing. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. The up-to-date facility description and the documents/information specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.*

*Major changes pertaining to VLOG certification are, e.g., change of products and/or processes.*

**i** *Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.*

### C 2.3 Assignment of Responsibilities, Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

**i** *Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.*

### C 2.4 Risk Management (KO)

#### Risk analysis

A documented risk analysis has been created for all relevant feed, procedures and processes, including risk evaluation for “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Feed for the “VLOG geprüft” area (e.g., countries of origin)
- incl. risk grading of feed (risk-prone/not risk-prone)

- Handling of feed that meets the requirements for “VLOG geprüft” labelling and feed that does not meet the requirements for “VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargo in the case of vehicles
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary



Explanation: An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: [https://www.ohnegentechnik.org/risk-prone\\_feed](https://www.ohnegentechnik.org/risk-prone_feed).

### **Risk management**

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

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

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

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

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

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

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

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

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

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

## **C 2.6 Incoming Goods Inspection**

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for “VLOG geprüft” production and/or labelling.

**Incoming goods inspection of VLOG-certified feed**

- The incoming goods inspection checks that the bills of lading or in the case of packed goods the packaging contain the “VLOG geprüft” label and/or the “VLOG geprüft” seal (see A 10). A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

**Incoming goods inspection of risk prone feed not certified by VLOG**

There must exist a confirmation from the supplier that all feed, feed additives and processing aids classified by the business as risk-prone (cf. Chapter C 2.4) are GMO-free or exempt from labelling. This can be achieved by:

- A separate declaration of the GMO-free status of the currently delivered batch/lot or
- A test result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered or
- An additional indication on the bill of lading declaring the products to be exempt from labelling or
- A clear contractual regulation regarding the delivery of feed exempt from labelling



*Explanation: VLOG recommends the following wording for the declaration of feed that is exempt from mandatory labelling but is not VLOG-certified: “The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”*

**Incoming goods inspection of non-risk-prone feed not certified by VLOG**

For all feed, feed additives and processing aids graded as non-risk-prone by the business (cf. Chapter C 2.4), the respective delivery slip for the feed need not be labelled under Regulation (EC) Nos. 1829/2003 and 1830/2003.

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

The physical and/or temporal separation of goods flows must ensure that at no time feed that is not suitable for “VLOG geprüft” labelling comes into contact with the goods flow for feed with “VLOG geprüft” labelling. Adequate procedural steps are to be in place to ensure that the contamination by GMO or non-compliant feed is reduced to an at least adventitious and technically unavoidable level. In addition, all feed must be clearly and consistently labelled in all process steps.

## **C 2.8 Handling of Non-Compliant Feed (KO)**

An effective and documented procedure for handling non-compliant feed is to be in place. At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter C 2.12)
- Labelling of the affected feed
- Notification of customers/buyers and suppliers
- Error management

- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

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



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

## C 2.9 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed existing in the business/at the site can be clearly identified at all times.
- The goods flow of “VLOG geprüft” feed as well as quantity lists and evaluations can be generated within one working day to allow conclusions about the plausibility of the goods flows.



*Explanation: For this purpose, the following data is to be determined, among others:*

- Information on supplier and delivery date
- Quantity
- Batch/lot formation, if applicable (including re-working)
- Information on delivery date and supplied customers

## C 2.10 Complaint Management

A documented system must be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

## C 2.11 Goods Recall

An effective and documented procedure for the goods recall, including determination of responsibilities, must be in place for non-compliant feed according to the VLOG Standard.

## C 2.12 Crisis Management (KO)



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

A current, documented procedure has been introduced for the management of incidents that may lead to a crisis situation. This includes, in particular, incidents that affect the product quality and legitimacy of “VLOG geprüft” feed. This procedure must be implemented and includes at least:

- The steps to follow in the event of an incident
- Assigned persons in charge including substitute rules

- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provisions requiring immediate notification of
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (31))
  - the VLOG Head Office using the VLOG Incident Sheet (see Annex (31))
- Legal advice (if required)

The crisis management procedure is periodically tested internally, at least once per calendar year, with regard to practicality, functionality and immediate implementation, with results documented.

### C 2.13 Corrective Action, Ongoing Improvement Process

If non-compliant feed is identified within the scope of internal audits, external audits or complaint management and/or lead to the identification of deviations from Standard requirements, the business must take and document corrective actions to prevent their reoccurrence.

The corrective actions must be implemented in due time, and their effectiveness must be checked within a reasonable period of time. Both are to be documented.

### C 2.14 Documentation and Retention Period

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to the “VLOG geprüft” labelling process or labelling with the “VLOG geprüft” seal are to be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the lot + one year, but not less than two years.



*Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, production and goods flow records (including re-work), training documents etc. In accordance with the Guideline for Monitoring GMOs in Feed, feed- (regarding GMO) related documents must be retained for five years.*

### C 2.15 Staff Training

All staff members involved in operating procedures of relevance to “VLOG geprüft” labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity and on an ongoing basis at least once per calendar year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility and the instructors.



*Explanation: The intensity of training varies depending on the staff member and is guided by the responsibility of the staff member for the proper flow of the “VLOG geprüft” operating procedure.*



*Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): [https://www.ohnegentechnik.org/staff\\_training](https://www.ohnegentechnik.org/staff_training).*

## C 2.16 Internal Audits

Each calendar year, the business must perform an internal audit that at a minimum covers the general and business-specific Standard requirements of the Feed Manufacturing Stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.

If the requirements for internal auditors cannot be met, e.g., due to the size of the business, an external auditor must be commissioned to perform the internal audit.

- Exception: An external counter-check can be waived for businesses with  $\leq 1,000$  tonnes of feed material produced per calendar year (based on dry weight) and for mobile grinding and mixing facilities.

## C 3 Specific Requirements for Feed Manufacturing/Processing

### C 3.1 Sampling and Testing

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

#### C 3.1.1 Sampling and Testing Plan

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

The sampling and testing plan, in compliance with the requirements listed in Chapter C 3.1.2 must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification)
- Frequency and periodic distribution of sampling and GMO testing
- Description of the test procedure (commissioned laboratory, scope of testing cf. [Guideline for Laboratories](#))

Sampling and GMO testing is not required if the utilised feed cannot be tested for genetic engineering for technical reasons. In this case the test plan must provide for a risk analysis reaching the conclusion which feed does not need to be sampled/analysed.



*Explanation: The VLOG homepage offers an assessment aid on the suitability of feed for testing: [https://www.ohnegentechnik.org/gmo\\_testing\\_suitability](https://www.ohnegentechnik.org/gmo_testing_suitability).*

#### C 3.1.2 Sampling and Commissioning a laboratory

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

- Feed: min. 400 g, max. 1 kg
- Feed material/raw materials (whole maize/corn kernels, soy beans or rapeseed/canola grains, among other): at least 3000 grains or approx. the respectively corresponding sample amount (maize/corn at least 1000 g; soy at least 700 g, rapeseed/canola at least 60 g)



**i** *Explanation: The minimum quantities referred to relate to entire grains and/or beans. For raw materials that exhibit better homogeneity (e.g., soya protein concentrate), smaller weighed portions may be used in coordination with the responsible laboratory and the client.*

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

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

The client for the GMO testing must check the VLOG recognition of the commissioned laboratory regularly, at least once per calendar year

When commissioning a laboratory, the following information must be indicated in the order or other documents having similar effect, and submitted to the laboratory:

- GMO testing order according to VLOG requirements
- Composition of the sample:
  - If containing soy, maize/corn, rapeseed/canola and/or rice feed material or ingredients, it must be indicated in what form these are contained (e.g., maize/corn as maize/corn flour, soy as soy extraction meal). Copies of the composition/declarations are to be sent to the laboratory along with the samples.

**i** *Explanation: Annex 3 of the Guideline for Laboratories provides guidance regarding the order form, which contains all the minimum information that the laboratory must have to test VLOG samples.*

### C 3.1.3 Frequency of Sampling and Testing

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

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

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

<sup>1</sup> Sites that only produce feed material not subject to compulsory labelling can dispense with sampling/GMO testing feed material if corresponding test was performed at the incoming goods point

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

### C 3.1.4 Evaluation of Test Results

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

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

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

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

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

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

Table C 3: Evaluation of Test Results feed

## C 3.2 Reference Samples

The business shall retain complete reference samples of all outgoing “VLOG geprüft” batches in suitable containers so it can draw conclusions as to the actual quality delivered, if necessary. The reference samples are retained for a period of time appropriate to the intended purpose and product perishability of the feed.



*Explanation: This applies to both bulk feed and packaged feed.*

## C 3.3 Outgoing Goods Control, Labelling on Bills of Lading

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging, using the word mark “VLOG geprüft” and/or the “VLOG geprüft” seal (cf. Chapter A 10). It must be clearly evident to which feed item the labelling refers.



*Explanation: When using the word mark, care must be taken to avoid any resemblance of its visual representation to the “VLOG geprüft” seal.*



*Explanation: VLOG recommends the following wording for the declaration of feed exempt from labelling and not certified by VLOG:*



*“The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”*

## C 4 Specific Requirements for Mobile Grinding and Mixing Facilities

### C 4.1 Specific Measures to Eliminate Contaminations

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

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

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

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

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

## C 4.2 Safeguarding with a Carryover Test



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

If feeds (including oils) subject to mandatory labelling are also ground/mixed, the operator of the grinding and/or mixing facility must conduct a carryover test for all identical models used, in order to validate the effectiveness of the measures taken to prevent carryover. If there are several technically identical models available in the facility, the test is to be conducted at the facility with the highest risk of carryover (e.g. measured by age or type/extent of repairs).

The results of the carryover test conducted are to be documented and retained at least until the next test. The business must derive appropriate measures from the results, if necessary.

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

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

- Facility with a complete discharge:
  - Performance of a complete discharge and a system purge in accordance with the manufacturer's instructions (or based on the business' own test results) after every mixing involving feed subject to mandatory labelling and before any "VLOG mixing".
- Brand new facility:
  - Presenting a detailed system report from the manufacturer, which provides evidence-based information on the specific carryovers resulting from each measure (complete discharge, use of a hammer mill, system purge of a certain size/quality, etc.).

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

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

## C 4.3 Mixing Documentation and Mixing Protocols

The mixing sequence and the individual mixtures per facility are to be documented on a daily basis in chronological order. From the documentation it must be evident which mixtures are those with feed that is subject to compulsory labelling and which ones are "VLOG mixtures".

For mixtures subject to compulsory labelling, the percentage of feed subject to compulsory labelling in the mixture must be indicated.

After finishing the mixture, each “VLOG mixture” is to be documented with two mixing protocols according to Annex (30) or an equivalent mixing protocol and countersigned by the facility operator. The facility operator and the client each receive a copy of the mixing protocol.



*Explanation: The documentation of the mixing sequence and the individual mixes may also consist of individual grinding and mixing protocols.*

## **C 4.4 Sampling**

### **C 4.4.1 Sampling Permission**

The operator of mobile grinding and mixing facility must have written permission from each VLOG-certified agricultural business or agricultural VLOG group member.

This permission authorises the operator of the mobile grinding and mixing facility to sample the manufactured “VLOG mixture”.

## **C 4.5 Identification on Bills of Lading**

VLOG-certified mixtures of feed not subject to mandatory labelling must be labelled on all bills of lading using the wording “VLOG mixture”.



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

## **Part D - Matrix Organisation Logistics and Feed Manufacturing**

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## Part D: Matrix Organisation Logistics and Feed Manufacturing

The following part of the Standard describes the requirements for a Matrix Organisation for Logistics and Feed Manufacturing, which is certified through a matrix certification for Logistics and Feed Manufacturing. Part Z (Certification) describes the certification process, risk grading (if necessary) and the resulting requirements for (future) VLOG-certified businesses.

### D 1 Stage Definition and Mandatory Certification

The requirements for the Logistics stage (Part B) and/or the Feed Manufacturing stage (Part C) apply to the matrix members. In addition, the requirements in Part D also apply to the matrix organiser. The audits check whether the matrix organiser has met all the requirements.

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

**Matrix organiser:** Business in a VLOG matrix that organises the certification of the matrix and holds responsibility for a risk management system that includes all matrix sites. With respect to the VLOG matrix organisation, certification is obtained via the matrix organiser, i.e., the latter receives the certificate for the VLOG Logistics and/or Feed Manufacturing matrix.

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

- A matrix member can only be a member in one VLOG matrix for a specified activity area (e.g. Transport).
- If a member performs various activities (e.g. transport and trading or feed manufacturing and transport), the business can be a member in multiple VLOG matrices for each activity area.
- If a business is a member of a VLOG matrix, an individual certification according to the VLOG Standard is not permissible for the same activity area.

**Matrix site:** A site that is contractually integrated into a VLOG matrix via a matrix member.

Table D 1: Stage Definition and Mandatory Certification

## **D 2 Requirements for Matrix Organisers**

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

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

### **D 2.2 Matrix Description, Site List, Facility Description**

#### **D 2.2.1 Matrix description (see Annex (18))**

The certification body must have a current matrix description from the matrix organiser. The matrix organiser must promptly notify the certification body of major changes to the matrix description pertaining to VLOG certification.

The matrix description must contain/provide at least:

- A list of the matrix sites and a full description of their activities
- A list and description of the activities of the outsourced processes (e.g. external service providers), which are integrated into the VLOG matrix, including the persons in charge and their contact data
- A list of all areas for which the matrix organiser is responsible (e.g. *risk management, sampling, testing* etc.)
- The persons in charge of the matrix certification organisation for the matrix organiser, including their contact information
- The basis used for the VLOG initial certification and the approval of additional sites in the future (100 % or 33 %-process)

#### **D 2.2.2 Site list (see Annex (18))**

A complete list of matrix sites and matrix members for the matrix organisation is to be on file and up to date. At a minimum, it must contain the following information:

- Address/clear identification of the site, name of business associated with the site.
- The last routine audit date
- Activity area (stage/sub- stage)

The matrix organiser will promptly notify the certification body of any changes to the site list.

At the request of VLOG, the matrix organiser must promptly send the current site list to VLOG.

#### **D 2.2.3 Facility description of sites**

The matrix organiser is responsible for the facility descriptions of the sites and for keeping them up to date. A current facility description must be available at the sites of the matrix members (Annex (13) Logistics and/or Annex (15) Feed Manufacturing). The matrix organiser will notify the certification body promptly of any internal changes pertaining to certification.



*Explanation: A major change pertaining to VLOG certification may be, for example, a change in the type of production (dual or completely exempt from mandatory labelling).*

## **D 2.3 Contractual Binding of the Members (KO)**

The matrix members/sites are to be contractually bound to the matrix organiser. The contract must contain at least the following items:

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

## **D 2.4 Risk Management (KO)**

### **Risk analysis**

A documented risk analysis has been created for all relevant feed, raw materials, products, procedures and processes, including risk evaluation for “Ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis includes at least:

- Feed, raw materials and products for the “Ohne Gentechnik”/“VLOG”/“VLOG geprüft” area (incl. countries of origin)
- Handling of feed, raw materials and products that meet the requirement for “Ohne Gentechnik”/“VLOG”/“VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “Ohne Gentechnik”/“VLOG geprüft” labelling
- 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 have been introduced, implemented and reviewed for efficacy for 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 matrix description, e.g. as part of an internal audit.

## **D 2.5 Commissioning External Service Providers**

External services for activities requiring certification in the areas of Feed Manufacturing, Transport, Storage, Trans-shipment and/or (Drop) Shipping (cf. Chapter B 1 Logistics, C 1 Feed Manufacturing) may be commissioned 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 system (cf. Chapter D 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 D 2.4).

## **D 2.6 Sampling and Testing**

### **D 2.6.1 Sampling and Testing Plan**

The matrix organiser is responsible for creating and implementing a sampling and testing plan for the matrix sites. It defines the risk-based sampling and GMO testing of feed.

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

- Determination of the risk-prone feed, raw materials and products to be sampled/tested based on the risk analysis to be carried out (cf. Chapter C 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, raw materials and products cannot be tested for genetic engineering for technical reasons.



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

### D 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.*

### D 2.6.3 Frequency of Sampling and Testing

At least the samplings and tests required under Parts B and/or C shall be conducted for each matrix member.

### D 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.

**Feed:**

Evaluation		Actions
GMO not verifiable or < 0.1%		
Labelling compliant, permissible for VLOG-production		No action needed
≥ 0.1 % ≤ 0.9 % GMO		
Case-by-case evaluation	Can the GMO contamination be traced back to your own business? (e.g., dual use)	<u>Yes</u> : Check whether the actions taken (cf. Chapter D 2.4/C 2.4) are adequate and properly implemented.  - If not, take further action in accordance with Chapters D 2.8 and D 2.11 (Or corresponding chapter in part B or C).
		<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 D 2.4/C 2.4) are not adequate and must be revised.
		<u>No</u> (No systemic cause): No action needed.
> 0.9 % GMO		
Not labelling compliant, not permissible for VLOG production		Take further action in accordance with the procedures established in Chapters D 2.8 and D 2.11 (Or corresponding chapter in part B or C).

Table D 2: Evaluation of test results for feed

**Food:**

Evaluation		Actions
<b>GMOs not verifiable or ≤ limit of detection (generally 0.1% GMO)</b>		
Labelling compliant, permissible for VLOG production		No action needed
<b>&gt; Limit of detection (generally 0.1% GMO)</b>		
Not labelling compliant, not permissible for VLOG production		Take further action in accordance with the procedures established in Chapters D 2.8 and D 2.11 (Or corresponding chapter in part B).

Table D 3: Evaluation of test results for food

### D 2.6.5 Evaluation of the analytical data

The matrix organiser:

- Collects the test results of the matrix sites, and evaluates these at least once per calendar year. These evaluations must be conducted for each matrix site.
- Defines risk-based measures (e.g. site evaluation) for the matrix sites as applicable.

## D 2.7 Staff and Member Training

All staff members of the matrix organiser involved in the operating procedures of relevance to “VLOG”/“VLOG geprüft” certification must be trained by the matrix organiser concerning the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. 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 matrix organiser must communicate all relevant requirements and information on “VLOG”/“VLOG geprüft” production to the members. 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).*

## D 2.8 Handling of Non-Compliant Feed, Raw Materials and Products (KO)

The matrix organiser has to have an effective and documented procedure for handling non-compliant feed, raw materials and products in place. At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter D 2.11)
- Labelling of affected feed, raw materials and products
- Notification of customers/buyers, suppliers and matrix member(s)
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, 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 D 2.6.4.



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

## D 2.9 Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. Those are to be evaluated in an appropriate manner. Corrective

actions (including determination of responsibilities and deadlines) are to be coordinated with the affected members and initiated for justified complaints and feedback.

## D 2.10 Goods Recall

An effective and documented procedure for the goods recall, including determination of responsibilities, is to be in place for non-compliant feed, raw materials and products according to the VLOG Standard.

## D 2.11 Crisis Management (KO)



*Explanation: Incidents are defined on the incident sheet (cf. Annex (32)).*

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

A current, documented procedure has been introduced for the management of incidents that may lead to a crisis situation. This includes, in particular, incidents that affect the product quality and legitimacy of "VLOG geprüft" feed or "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
- Provisions requiring immediate notification of
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (32))
  - the VLOG Head Office using the VLOG Incident Sheet (see Annex (32))
- 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.

## D 2.12 Corrective Action, Ongoing Improvement Process

If internal audits, external audits, or complaint management result in the identification of non-compliant feed and/or deviations from Standard requirements, the matrix organiser, if applicable together with the members, is to take and document corrective actions to prevent their reoccurrence.

The matrix organiser is responsible for the timely implementation of corrective actions at the sites. The effectiveness of these actions must be reviewed within a reasonable period of time. Both are to be documented.

## D 2.13 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to the matrix certification and "VLOG geprüft"/"VLOG" labelling or labelling with "VLOG



geprüft"/"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.*

## **D 2.14 Internal Audit**

The matrix organiser must perform at least one internal audit per calendar year at each matrix site, which at a minimum covers the general and site-specific Standard requirements of the stages of Matrix Organisation and Logistics or Feed Manufacturing. The matrix organiser is subject to at least one internal audit per calendar year, which covers all requirements of the Matrix Organisation Stage according to the Standard.

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.



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

## **Part E - Agriculture**

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## Part E: Agriculture

In this part of the Standard, the requirements for the Agriculture Stage and its sub-stages (incl. Animal Transport and Livestock Trade) are described. Part Z: (Certification) describes the certification process and the resulting requirements for (future) VLOG-certified businesses.

### E 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	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
<b>Sub-stage of Animal production:</b> The production of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.			
Primary production of food of animal origin (e.g. milk, meat, eggs, honey, fish...)	For any agricultural business that carries out primary production to be labelled as “Ohne Gentechnik” and whose “Ohne Gentechnik” production fulfils the following business sizes: <ul style="list-style-type: none"> <li>• Apiary: ≥ 50 beehives</li> <li>• Egg-producing operations: ≥ 350 animal spaces</li> <li>• Milk production: annually ≥ 10 cows</li> </ul>	For any agricultural business that carries out primary production to be labelled as “Ohne Gentechnik” and whose “Ohne Gentechnik” production fulfils the following business sizes: <ul style="list-style-type: none"> <li>• Apiary: &lt; 50 beehives</li> <li>• Egg-producing operations: &lt; 350 animal spaces</li> <li>• Milk production: annually &lt; 10 cows</li> </ul> <i>A document check is necessary.*</i>	E 1 - E 4
<b>Rearing, sale and outsourcing of animals</b>			
Laying hens	For agricultural businesses that sell pullets to the aforementioned primary producers and whose “Ohne	For agricultural businesses that sell pullets to the aforementioned primary producers and whose	E 1 - E 4

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
	<p>Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:</p> <ul style="list-style-type: none"> <li>• Rearing of laying hens: <math>\geq 700</math> animal spaces</li> </ul>	<p>“Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:</p> <ul style="list-style-type: none"> <li>• Rearing of laying hens: <math>&lt; 700</math> animal spaces</li> </ul> <p><i>A document check is necessary.*</i></p>	
Piglets	<p>For agricultural businesses that sell piglets to the aforementioned primary producers and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following two requirements are fulfilled:</p> <ul style="list-style-type: none"> <li>• The facility is not registered with VLOG as a piglet rearing facility <u>and</u></li> <li>• business fulfils the following business size: <math>\geq 250</math> animal spaces for piglets under 30 kg</li> </ul>	<p>For agricultural businesses that sell piglets to the aforementioned primary producers and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled:</p> <ul style="list-style-type: none"> <li>• <math>&lt; 250</math> animal spaces for piglets under 30 kg</li> </ul> <p><i>A document check is necessary.*</i></p>	E 1 - E 4
		<p>For agricultural businesses that sell piglets to the aforementioned primary producers and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following requirement is fulfilled:</p> <ul style="list-style-type: none"> <li>• The facility is not registered with VLOG as a piglet rearing facility</li> </ul> <p><i>Please contact the VLOG head office for information regarding registration.</i></p> <p><i>Proof in accordance with Annex (2) is required (cf. Chapter E 4.8)</i></p>	E 1 - E 4

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
Cattle and other ruminants for dairy and meat production	<p>For agricultural businesses that sell gestating cows (dry cows)<sup>1</sup> and/or dairy cows (as of second lactation) to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled:</p> <ul style="list-style-type: none"> <li>• <math>\geq 20</math> animal spaces in ruminant rearing/maintenance of gestating cows</li> </ul>	<p>For agricultural businesses that sell <u>gestating cows (dry cows) and/or dairy cows (as of second lactation)</u> to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled:</p> <ul style="list-style-type: none"> <li>• <math>&lt; 20</math> animal spaces in ruminant rearing/maintenance of gestating cows</li> </ul> <p><i>A document check is necessary.*</i></p>	E 1 - E 4
		<p>For agricultural businesses that sell <u>young cattle and dairy cows in first lactation</u> to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period.<sup>2</sup></p> <p><i>Proof in accordance with Annex (2) is required (cf. Chapter E 4.8)</i></p>	E 1 - E 4

<sup>1</sup> Gestating cows (dry cows): milk-producing animal (e.g. a cow) which is not milked for the time between two lactation periods.

<sup>2</sup> VLOG is still discussing the certification obligation or alternative registration obligation for facilities that rear young cattle. Changes to the current procedure will be published in future versions of the Standard, if necessary.



	<b>Certification required according to VLOG Standard</b>	<b>Approval by document check, registration and/or proof, Annex (2)</b>	<b>Standard requirements</b>
Other types of animals	For agricultural businesses that sell (young) animals to the aforementioned primary producers or temporarily hold VLOG animals in this category as a service to VLOG businesses and whose “Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period.	<i>A document check is possible for very small facilities. Please ask the VLOG head office about the precise limits on facility sizes for individual types of animals.</i>	E 1 - E 4

\* If an agricultural business is smaller than one of the aforementioned business sizes, a document check is necessary. Please contact the VLOG head office in this regard.

	<b>Certification required according to VLOG Standard</b>	<b>Certification not required according to VLOG Standard</b>	<b>Standard requirements</b>
<b>Sub-stage of Plant-based production:</b> The cultivation of primary products, including harvesting and foraging.			
Cultivation of feed	For the cultivation of feed on the business’ own farm if it is located in an EU country in which the cultivation of feed or the release of genetically modified plants for research purposes is permitted or known.	In EU countries in which the cultivation and the release of genetically modified plants for research purposes is prohibited by law.	E 1-E 3, E 5
Cultivation of raw materials (food)		For the production of plant-based raw materials (food).	

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Sub-stage of Animal transport/livestock trade:</b> Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transloading and resting, until the completion of unloading of the animals at the intended destination. As opposed to the exclusive carrier, a livestock trader (temporarily) owns the animals.			
	For livestock trade with VLOG animals		E 1-E 3, E 6
	For commercial animal transport of VLOG animals, provided that least one of the following three requirements is fulfilled: <ul style="list-style-type: none"> <li>• <u>No</u> commissioning by a VLOG certified business.</li> <li>• Transport is <u>not</u> integrated into the risk management of the VLOG certified business.</li> <li>• There is <u>no</u> agreement in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard.</li> </ul>	For commercial animal transport, provided that all of the following three conditions are met: <ul style="list-style-type: none"> <li>• Commissioning by a VLOG certified business.</li> <li>• Transport is integrated into the risk management of the VLOG certified business.</li> <li>• An agreement is in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard.</li> </ul>	E 1-E 3, E 6
		Trade and commercial transport of animals which have not yet begun the minimum feeding conversion period.	E 1-E 3, E 6

Table E 1: Stage Definition and Mandatory Certification

## E 2 Criteria for Risk Grading



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](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):

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
<b>GMO feed within the business</b>	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> <li>No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site.</li> <li>Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.</li> </ul>	<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 site<sup>3</sup>.</p>
<b>Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn</b>	<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>
<b>Certification status of risk-prone feed in VLOG production (cf. Chapter E 4.2)</b>	<p>Risk-prone feed and the feed supplier (excluding cf. Chapters B 1, C 1) must be certified pursuant to the VLOG Standard or a standard recognised as equivalent.</p>		<p>Risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.</p>

<sup>3</sup> 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
	This also applies to oils used for dust binding in grinding and mixing facilities.		Risk-prone feed is being used that has been certified pursuant to the VLOG Standard but lost the certification status due to a violation of the certification obligations in the supply chain (cf. chapter B 1 or C 1).
<b>Use of grinding and/or mixing facilities</b>	<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"> <li>• The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio<sup>4</sup>).</li> <li>• Measures to prevent contaminations with GMO are described in the QM manual of the facility operator.</li> </ul>	<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>

<sup>4</sup> 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

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
<b>Livestock transport/livestock trade</b>	The animals are not fed in the business, during transport, trans-shipment and rest periods.	The animals are fed in the business, during transport, trans-shipment and rest periods. In this case, the other risk-grading criteria in this table also apply.	

Table E 2: Criteria for Risk grading

## E 3 General Requirements

### E 3.1 Standard Usage Agreement with VLOG

For individually certified businesses there must be a Standard Usage Agreement signed by both parties, including the VLOG ID (10-xxxxx) issued by VLOG.

### E 3.2 Facility Description

The facility description (Annex (20a), (20b) or (20c)) with all relevant annexes must be available and up to date.

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

**i** *Explanation: Information transmitted in electronic form will be accepted. For the audit, the current facility descriptions, annexes (VLOG templates or own documents with equivalent content) and documents 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 must be submitted to the auditor for further processing at the certification body and forwarding to VLOG.*

*Major changes pertaining to VLOG certification are, e.g., change of risk category.*

**i** *Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business may still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.*

### E 3.3 Assignment of Responsibilities, Organisational Chart

There must be an up-to-date organisational chart that:

- describes the organisational structure and
- lists responsibilities and substitution rules.

**i** *Explanation: This must also include temporary staff, trainees, interns, etc. if their work is relevant. This overview is to be updated as persons join or leave the process or responsibilities are reassigned.*

In the case of small operations<sup>5</sup>, this may be done as part of the facility description.

### E 3.4 Risk management

**i** *Explanation: If the facility description addresses all points of the risk analysis **and the risk management**, a separate risk analysis document will not be required.*

---

<sup>5</sup> For definition see Glossary

**Risk analysis**

A documented risk analysis must be in place for all relevant facility-specific procedures and processes including assessment of the risks for “Ohne Gentechnik”/“VLOG” labelling.

The risk analysis must at a minimum cover the following points:

- Entry through feed subject to compulsory labelling
- Entry through feed from the grower's own cultivation
- Contamination by third parties
- Contamination within the business (e.g., via equipment or personnel)
- Joint use of machines, facilities / external service providers (cf. Chapter E 3.5)
- Mixing and interchange of VLOG animals and non-VLOG animals

**Risk management**

Detailed measures tailored to the business in question must be determined on the basis of this identification of the various sources of carryover and contamination. These measures must preclude the possibility of future contamination by or from feed requiring a GMO declaration.

The individual operative and risk-based procedural steps must be

- documented for each operation with separate proof of adequate logistical measures (e.g. spatial and temporal separation)
- implemented accordingly and
- reviewed for efficacy as part of the self-monitoring process.

## **E 3.5 Commissioning External Service Providers, Joint Use of Machines and Facilities**



*Explanation: The facility description must document the commissioning of external service providers and the joint use of machines and facilities.*

**External Service Providers**

External service providers may be commissioned for activities requiring certification (cf. Chapters B 1 Logistics, C 1 Feed Manufacturing, E 1 Agriculture (e.g. rearing of animals) 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.

**Joint Use of Machines and Facilities**

If machines/facilities for feed preparation or manufacturing are used jointly with other agricultural businesses, this must be noted in the business' risk management programme (cf. Chapter E 3.4) and, if necessary, appropriate procedural steps and actions to prevent GMO-contamination must be established. This also applies to machines for feed cultivation unless GMO-cultivation is verifiably prohibited in the cultivation country. If actions are necessary to ensure compliance with the requirements of the VLOG Standard during joint machine use, an appropriate compliance agreement must be available.



The certification of VLOG-certified grinding and/or mixing facilities must be checked regularly, at least once per calendar year.

## E 3.6 Handling of Non-compliant Feed, Products and Animals (KO)

An effective and documented procedure must be in place for handling non-compliant feed, products and animals or positive test results or other findings regarding non-compliance with “Ohne Gentechnik” requirements.

At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter E 3.9)
- Labelling of the affected feed, products and animals
- Notification of customers/buyers and suppliers
- 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 E 4.11.5.

For positive test results of unlabelled feed that is, however, clearly subject to compulsory labelling, the residual contaminated feed must be replaced or used outside the “Ohne Gentechnik” production once the erroneous labelling becomes known.

If a serious infraction of VLOG production occurred through faulty labelling of feed, the minimum feeding conversion period for the animals concerned must start anew, shortened according to specific circumstances if applicable.



*Explanation: Food which has already been marketed (e.g. milk with “Ohne Gentechnik” labelling) needs not be recalled.*



*Explanation: The severity of the infraction must be examined in each individual case by the respective certification bodies; it is influenced in particular by the following factors:*

- *The farmer was aware that the feed should have been labelled according to Regulations (EC) No. 1829/2003 and No. 1830/2003*
- *Lack of due diligence at reception of feed*
- *Quantity of the wrongly declared feed that was actually fed*
- *GMO portion in the feed*
- *Time during which the wrongly declared feed was fed*



*Explanation: A legal opinion of the law firm [GGSC] on behalf of VLOG offers additional orientation for businesses and the certification bodies concerning the decision as to whether a new start is required.*

*(Legal Opinion dated 23 November 2015:*

*[http://www.ohnegentechnik.org/ggsc\\_stellungnahme\\_fuetterungsfrist](http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist))*

## E 3.7 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All feed and “Ohne Gentechnik”/“VLOG” products and animals present at the facility that are associated with the “Ohne Gentechnik”/“VLOG” label can be clearly identified at all times.
- The goods flow of “Ohne Gentechnik”/“VLOG” products and animals as well as quantity lists and evaluations can 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*
- *Information on delivery date and supplied customers and business partners*

## E 3.8 Complaint Management

### Individual certification

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.

### Group certification

Agricultural businesses that are included in a VLOG group must inform their group organiser in the event of complaints and claims and coordinate corrective actions with the group organiser.

## E 3.9 Crisis Management (KO)



*Explanation: Incidents are defined on the incident sheet (cf. Annex (33)).*

### Individual certification

In the event of an incident, the agricultural business must notify the competent certification body. Further measures will be agreed upon between them.

A current, documented procedure has been introduced for the management of incidents that may lead to a crisis situation. This includes, in particular, incidents that affect the product quality and legitimacy of “VLOG geprüft” feed or “Ohne Gentechnik”/“VLOG” raw materials or products. This procedure including the contingency plan 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
- Provision requiring immediate notification of
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (33))

- the VLOG Head Office using the VLOG Incident Sheet (see Annex (33))

### **Group certification**

For agricultural businesses that are included in a VLOG group, the group organiser would take over crisis management (cf. Chapter F 2.10). In the event of an incident, the agricultural business must notify the group organiser. Further measures will be agreed upon with the group organiser.

## **E 3.10 Corrective Action**

If non-compliant feed, products or animals and/or deviations from Standard requirements are identified within the scope of internal audits, external audits or complaint management, the business must take and document corrective actions to prevent their reoccurrence.

The corrective actions must be implemented in due time, and their effectiveness must be checked within a reasonable period of time. Both are to be documented.

## **E 3.11 Documentation and Retention Periods**

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to VLOG production 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 include bills of lading, invoices, feed accompanying documents, training documentation, declarations, etc. In accordance with the Guideline for Monitoring GMOs in Feed, feed (regarding GMO) -related documents must be retained for five years.*

## **E 3.12 Staff Training**

All staff involved in the operating procedure of the “VLOG” sector shall be trained concerning the requirements of the VLOG Standard and the operating procedures laid down therein. Training shall take place before they take up their activity as well as on a continuous 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: For small agricultural businesses (see Glossary), there is no need for separate “VLOG” training for employees.*



*Training may take place in the form of practical instructions. 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](https://www.ohnegentechnik.org/staff_training).*

## **E 3.13 Self-monitoring**

An internal self-monitoring is to be performed once per calendar year. During this monitoring, the facility description will be checked and updated as appropriate. The monitoring and results must be documented in the facility description.

## E 4 Specific Requirements for Animal Production

### E 4.1 Animal Inventory

All animals kept in the business for food production are recorded in a current livestock overview. Either this or the stable space overview in the facility description must indicate whether the feeding of the animals is “Ohne Gentechnik”-compliant or not.

### E 4.2 Risk-prone Feed

All feed material of the plant species soy, rapeseed/canola, maize/corn, sugar beet and cotton used by the business in VLOG production as well as compound feed that contains these species or was made from them shall be classified as risk-prone or not risk-prone in accordance with the following criteria.

Risk-prone	Not risk-prone
	There is a VLOG certification or a certification recognised as equivalent for feed material of the plant species soy, rapeseed/canola, maize/corn, sugar beet and cotton and for compound feed that contains these species or was made from them.
<b>Soy, rapeseed/canola, cotton</b>	
Feed material of these species and compound feed that contains or was made from them.	<u>Feed material</u> from plant species that directly originate from a producer from a cultivation country where the cultivation of genetically modified plants is prohibited and the feed was neither processed by third parties nor transported by a commercial shipper
<b>Maize/corn</b>	
Feed material from maize/corn and compound feed that contains maize/corn or was made from it.	<p><u>Feed material</u> from maize/corn that directly originates from a producer from Bulgaria, Denmark, Germany, France, Greece, Italy, Croatia, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Northern Ireland, Austria, Poland, Scotland, Switzerland, Slovenia, Hungary, Wales, Wallonia (Belgium) or Cyprus and the feed was neither processed by third parties nor transported by a commercial shipper.</p> <p><b>Dried maize/corn kernels</b> if the following two conditions are met:</p> <ul style="list-style-type: none"> <li>• Verified cultivation of the maize/corn in the aforementioned countries</li> <li>• Purchase made directly from a drying facility that only dries goods not subject to labelling and maize/corn from the aforementioned countries. A written confirmation is available.</li> </ul> <p><b>Maize/corn silage or silage maize/corn</b> if the following two conditions are met:</p> <ul style="list-style-type: none"> <li>• Verified cultivation of the maize/corn in the aforementioned countries</li> <li>• Purchased utilising one of the following three options: <ul style="list-style-type: none"> <li>– drop shipper with transport directly from the producer to the customer without intermediate storage</li> </ul> </li> </ul>

Risk-prone	Not risk-prone
	<p>– Trader:</p> <ul style="list-style-type: none"> <li>○ only stores/trans-ships silage corn/maize or maize/corn silage from the aforementioned countries OR</li> <li>○ only trades producer-wrapped/shrink wrapped silage with delivery to the customer in this packaging</li> </ul> <p>A batch-specific certificate of origin/declaration by the drop shipper, trader or producer must be on file.</p>
Sugar Beets	
Feed material from sugar beets and compound feed that contains sugar beets or was made from them.	<p>Feed material from sugar beets and compound feed that contains sugar beets or was made from them in compliance with the following conditions:</p> <ul style="list-style-type: none"> <li>• cultivation and if applicable, processing, in the EU or Switzerland</li> <li>• For each campaign, there is a meaningful confirmation from the producer that only non-labelled sugar beets are processed.</li> </ul>

Table E 3: Overview of risk-prone and non-risk-prone feed

## E 4.3 Feed Ordering



*Explanation: Non-risk-prone feed (cf. Chapter E 4.2 e.g. VLOG certified feed bearing the word mark and/or the seal “VLOG geprüft”) may be used without written orders and/or additional contractual agreement.*

Risk-prone feed (cf. Chapter E 4.2) for VLOG production must be ordered in writing, stating the following aspects:

- Animal species/Animal category
- Feed type/designation
- Reference to feed quality not subject to compulsory labelling or use for the production of food labelled as “Ohne Gentechnik”/“VLOG”

As an alternative to ordering feed in writing, for feed relevant for VLOG production there must be:

- a written agreement with the supplier that the feed supplied is suitable for production of “Ohne Gentechnik”/“VLOG” labelled food and not subject to compulsory labelling

or

- additional information of the feed supplier on the bill of lading/delivery slip with the following wording:  
“The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ...”

## E 4.4 Feed List

An up-to-date feed list of the purchased feed must be included in the facility description (cf. Chapter E 3.2), in which all feeds purchased by the business, their origin as well as their intended use (animal species/animal category) are indicated.



*Explanation: For small businesses<sup>6</sup>, a chronologically filed collection of invoices and bills of lading is an alternative to a feed list.*

## E 4.5 Feed Rations

Current feed rations for all animals of VLOG production must be documented taking into account differences in life phases or season.

## E 4.6 Incoming Goods Inspection of Feed (KO)

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for the VLOG production. All bills of lading for purchased feed must be reviewed for completeness of the information provided and filed in chronological order.

### Incoming goods inspection of bulk VLOG certified feed:

- The accompanying bills of lading must be checked for the “VLOG geprüft” label. A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once per calendar year.

### Incoming goods inspection of bagged VLOG certified feed:

- All bags must be checked for the “VLOG geprüft” label.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once per calendar year.



*Explanation: Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification. The labelling of the warning documents to be duly checked is listed in the following document: <https://www.ohnegentechnik.org/SRAE>.*

### Incoming goods inspection of feed not certified by VLOG:

- The waiver of labelling in accordance with Regulation (EC) No. 1829/2003 and No. 1830/2003 on feed labels or bills of lading must be examined.

## E 4.7 Compliance with the Minimum Feeding Conversion Period (KO)

Before food from animal sources (meat, milk, eggs) can be labelled “VLOG” or with the “Ohne GenTechnik” seal an exclusive “Ohne Gentechnik” feeding regimen must be followed for the minimum feeding conversion period defined for each animal species and intended use according to Table E 4. The process for complying with the minimum feeding conversion period must be described.

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<sup>6</sup> See Glossary

Animal species	Period
Equids and cattle (including water buffaloes and bison species) for meat production	twelve months and in any case at least three quarters of their life
Small ruminants	six months
Pigs	four months
Milk-producing animals	three months
Poultry intended for meat production put in stalls before the age of 3 days <sup>7</sup>	ten weeks
Poultry for egg production	six weeks
Other animal species/categories	from the time of birth/hatching

Table E 4: Minimum feeding conversion period according to EGGenTDurchfG

If an animal was fed with feed subject to compulsory labelling during or after the minimum feeding conversion period (cf. Chapter E 3.6), the conversion period must start anew for this animal.

## E 4.8 Purchase of animals (KO)

The requirements for the purchase of animals listed in the Table E 5 must be followed:

	Criterion	Requirement or proof required
“Ohne Gentechnik” - compliant feeding period at the rearing facility/facility of the previous owner will be counted	Rearing facility/previous owner is VLOG-certified (individual or group certification)	<ul style="list-style-type: none"> <li>VLOG certification (or certification recognised as equivalent) of the rearing facility/previous owner or integration into a VLOG group must be checked regularly, at least once per calendar year, and</li> <li>There is written confirmation from the rearing facility/previous owner in accordance with Annex (2)</li> </ul>
	Rearing facility/previous owner is <u>not</u> VLOG-certified	<ul style="list-style-type: none"> <li>The rearing facility/previous owner under E 1 is not subject to certification obligation <u>and</u></li> <li>There is written confirmation from the rearing facility/previous owner in accordance with Annex (2)</li> </ul>
		<b>Only relevant for piglet rearing facilities:</b> <ul style="list-style-type: none"> <li>The rearing business is registered with VLOG and</li> </ul>

<sup>7</sup> The minimum feeding conversion period for poultry for meat production in the table given above is equivalent to a flat period of ten weeks prior to slaughter, not including the first three days of life.

	Criterion	Requirement or proof required
		<ul style="list-style-type: none"> <li>Registration of the rearing business must be checked regularly, at least once per calendar year (registration certificate) and</li> <li>There is a written confirmation from the previous owner in accordance with Annex (2)</li> </ul>
“Ohne Gentechnik” - compliant feeding period at the rearing facility/ facility of the previous owner will <u>not</u> be counted	Rearing facility/previous owner is VLOG-certified or not VLOG-certified	<ul style="list-style-type: none"> <li>The complete minimum conversion feeding period will be ensured at the buyer’s VLOG facility</li> </ul>

Table E 5: Criteria and requirements for the purchase of animals



*Explanation: As an alternative to the use of Annex (2), a contractual agreement can be concluded with the previous owner for “Ohne Gentechnik”-compliant feeding (including appropriate measures). This agreement must include at least the following:*

- A traceable, documented procedure regarding the period of “Ohne Gentechnik”-compliant feeding.*
- The following addendum must be included: “The previous owner authorises Verband Lebensmittel ohne Gentechnik (VLOG) to verify the accuracy of the information on “Ohne Gentechnik”-compliant feeding, using on-site controls through random sampling or if there are reasonable suspicions and to take samples for testing purposes. These inspections may be carried out by third parties on behalf of VLOG.”*
- Changes/corrections must be promptly reported to the relevant facility.*

## E 4.9 Segregation of Goods Flows, Exclusion of Contamination (KO)

### Feeding conversion:

At the start of the feeding conversion suitable actions must be taken to prevent contamination with GMOs, which actions must include all equipment, storage and other facilities, mixing facilities, means of transport, etc. that come in contact with feed.

### Feed of different qualities:

If feed subject to compulsory labelling is (temporarily) available in the business, the following requirements must be met:

- Due to spatial and/or temporal segregation of goods flows, at no time does feed subject to mandatory labelling wind up in the goods flow of feed used to produce “Ohne Gentechnik” food
  - All actions set forth in Chapter E 3.4 must be carried out and documented. It must also be documented where any residual quantities of feed that requires labelling were moved to.





*Explanation: Equipment and storage areas, for example, must be verifiably cleaned after having transported bulk feed subject to compulsory labelling.*

- Additionally, in the case of temporal segregation:
  - Proof of the effectiveness of the actions for dealing with feed subject to mandatory labelling and non-labelled feed for VLOG production based on representative test results (cf. Chapter E 4.11)
- Interchangeable feed subject to compulsory labelling must be labelled with the intended use (animal category to which the feed is intended to be fed).
- In an operating unit there is no parallel use of feed not subject to compulsory labelling for VLOG production and swappable feed that is subject to such labelling whose purpose is not clearly defined or which can be used in several ways for a number of animal categories (e.g. feed material soy bean meal).



*Explanation: The presence of feed the suitability of which for “Ohne Gentechnik” feeding is not ensured is permissible if the intended use thereof and the segregation from areas dedicated to “Ohne Gentechnik” production is clearly documented (for example, conventional complete or supplementary feed for breeding sows in an operation where dairy cattle are fed “Ohne Gentechnik” feed does not pose a problem).*

#### **Feed mixer vehicles**

If feed mixer vehicles are used internally or externally for both feed subject to compulsory labelling and feed not subject to compulsory labelling, the measures for avoiding contaminations as stated in Chapter E 3.4 must be taken.

- At least one sufficient system purge or wet cleaning must be carried out between feed subject to compulsory labelling and feed for the VLOG production. The system purge is to be used outside of the VLOG production.

#### **Products and animals of different qualities:**

There is no parallel production (VLOG production and conventional production) with respect to the same category of animals.

- Permissible exception: The different productions take place in completely different operating facilities, which also involves completely separate storage and handling of feed, products and animals. In this case, the following requirements must be met:
  - All actions to prevent the mixing or interchange of products or animals set forth in Chapter E 3.4 must be carried out and documented.
  - All responsible employees must be aware of the GMO status of the feed and the conversion status of the individual animals/fattening batches at all stages

## **E 4.10 Use of Grinding and Mixing Facilities**

### **E 4.10.1 Continuation of System Purges**

System purges must not be used in VLOG production. The continuation of system purges must be documented.

## **E 4.10.2 Joint Use of Mobile Grinding and/or Mixing Facilities**

### **E 4.10.2.1 Contractual Agreement with the Facility Operator**

#### **VLOG-certified Mobile Grinding and Mixing Facilities**

The agricultural business must give the operator of the mobile grinding and/or mixing facility written consent to sample the “VLOG mixture” produced and provide the statement to the latter.

#### **Non-VLOG-certified mobile grinding and mixing facilities**

There must be a written agreement between the farmer and facility operator, which at a minimum covers the following obligations:

- The facility operator must ensure through a complete discharge and/or system purge at the facility that the facility is not subject to mandatory labelling of feed.
- Scheduled maintenance and cleaning of the respective facility as well as its use according to the operating manual
- At least one complete discharge and/or system purge in accordance with the manufacturer's instructions – depending on the facility - must be carried out after any mixing involving material subject to mandatory labelling and before use in VLOG production
  - If the previous mixture consisted of >40 % feed subject to mandatory labelling (based on the total weight of the mixture):
    - A system purge must be carried out, irrespective of the facility
    - This is also required if a complete discharge has already been performed.
- At the request of the farmer, the effectiveness of the actions must be proved (e.g., by a facility certificate)
- Documenting the grinding and mixing processes carried out based on the grinding and mixing protocol according to Annex (30) or an equivalent mixing protocol
- When purchasing oils/fats from facility operators: Use of oils/fats not subject to compulsory labelling for VLOG production

### **E 4.10.2.2 Grinding and Mixing Protocol**

For each grinding and mixing process for the VLOG production, a grinding and mixing protocol according to Annex (30) or an equivalent mixing protocol is to be prepared that is completely filled out and signed by the facility operator.

## **E 4.10.3 Use of Stationary Grinding and Mixing Facilities**

### **E 4.10.3.1 Use Exclusively for Feed Not Subject to Compulsory Labelling**

The exclusive use of feed not subject to compulsory labelling/“VLOG geprüft” feed must be documented in the facility description.

### **E 4.10.3.2 Use for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling**

Individual measures/requirements are to be derived, documented and implemented according to chapter E 4.9 for each facility to prevent the carryover of GMO feed from previous mixtures during the production of mixtures for the VLOG production. Other risk factors such as the age of the facilities and repairs will be taken into account.

The proper facility operation has to be ensured. Each facility has to be cleaned in accordance with the business's cleaning schedule. Maintenance and cleaning are to be documented.

The following applies to the performance of system purges and complete discharges:

- At least one complete discharge and/or system purge in accordance with the manufacturer's instructions – depending on the facility - must be carried out and documented after any mixing involving material subject to mandatory labelling and before use in VLOG production
- If the previous mixture consisted of >40% feed subject to mandatory labelling (based on the total weight of the mixture):
  - A system purge must be carried out, irrespective of the facility
  - This is also required if a complete discharge has already been performed.
- Daily documentation of the grinding and mixing processes carried out in a grinding and mixing protocol in accordance with Annex (30) or a mixing protocol with identical content.

## E 4.11 Sampling and Testing

In the business, risk-based sampling and GMO testing of risk-prone feed relevant for the VLOG production is to be carried out in accordance to the following principles.

### E 4.11.1 Sampling and Testing Plan

In individually certified businesses, 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 Chapters E 4.11.2 and E 4.11.3, must at a minimum contain/define the following:

- A written documented risk analysis (cf. Chapter E 3.4) of the risk-prone feed used and, based on this, the determination of the risk-prone feed to be sampled/tested (cf. Chapter E 4.2).
- 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)



*Explanation: Sampling and GMO testing are not necessary if the risk-prone feed cannot be analysed for genetic engineering for technical reasons.*

*The VLOG homepage offers an assessment aid on the suitability of feed for testing: [https://www.ohnegentechnik.org/gmo\\_testing\\_suitability](https://www.ohnegentechnik.org/gmo_testing_suitability).*

### E 4.11.2 Sampling, Retention of Reference Samples

#### Sampling frequency:

Sampling must take place in the following cases:

- At every delivery of risk-prone feed material and compound feed (cf. Chapter E 4.2)
- When using a stationary or mobile grinding and mixing facility in accordance with the guidelines in Table E 6.

- After each switch to “Ohne Gentechnik”-compliant feeding, if there is a regular alternation between “Ohne Gentechnik”-compliant feeding and feeding with feed subject to mandatory labelling (e.g., turkey fattening) in a VLOG stable or associated feeding facility. The relevant sample must be taken at the start of the minimum feeding conversion period at the site of the feeding rack (e.g., the feeding trough).



*Explanation: Sampling of bagged goods (incl. temper-resistant and sealed big bags) which are marked with the word mark and/or the seal “VLOG geprüft” seal or certified by a standard recognised as equivalent on delivery is not required.*

#### **Sampling:**

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.*



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

#### **Retention of reference samples:**

The reference samples of the samples taken must be retained for at least two months. In addition, for each of the two relevant categories<sup>8</sup>, at least the three most recent reference samples must always be retained, even if they are more than two months old.

### **E 4.11.3 Commissioning a Laboratory**

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

The client for the GMO testing must check the VLOG recognition of the commissioned laboratory regularly, at least once per calendar year.

When commissioning a laboratory, the following information must be indicated in the order or other documents having similar effect, and submitted to the laboratory:

- GMO testing order according to VLOG requirements
- Composition of the sample:
  - If containing soy, maize/corn, rapeseed/canola and/or rice feed material or ingredients, it must be indicated in what form these are contained (e.g. maize/corn as maize/corn flour, soy as soy extraction meal). Copies of the composition/declarations are to be sent to the laboratory along with the samples.

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<sup>8</sup> Delivery of risk-prone feed; switch between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling



*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.*

#### **E 4.11.4 Frequency of Testing**

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).

##### **Frequency of Testing**

A GMO-test of the following sampled feed and feed mixtures must be conducted:

- at least once in each audit interval from the feed (delivery of risk-prone feed) or the mixed/ground feed (from a non-certified grinding and mixing facility) with the highest risk and also
- after every switching to “Ohne Gentechnik” feeding, if a VLOG operating unit/VLOG barn regularly switches between “Ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling.

*Example turkey fattening farm: A switch to “Ohne Gentechnik”-compliant feeding is possible here because the life span of the animal is longer than the “Ohne Gentechnik” minimum feeding conversion period (cf. Chapter E 4.7).*



*Explanation: If collective samples of feed are tested, the results may not be factored as test results pertaining to individual operations. For each agricultural business at least one test result that refers to a specific delivery of risk-prone feed material or compound feeds or mixtures of grinding and mixing facility is to be produced in each auditing interval.*

##### **Mobile and stationary grinding and mixing facilities**

In the respective audit interval, at least the testing frequencies listed in Table E 6.

The samples have to be taken from the mixed/ground feed.

	Mobile grinding and/or mixing facility is VLOG-certified <sup>9</sup>	Mobile grinding and/or mixing facility is not VLOG-certified	Stationary grinding and/or mixing facility (only for feed used within the farm)
Facility exclusively processes feed not subject to compulsory labelling	Sampling + testing not required	1 test result per audit interval	Sampling + testing not required
Facility also processes feed subject to compulsory labelling	Sampling + testing not required		1 test result per audit interval OR Farmer performs a carryover test every 5 years (cf. Chapter C 4.2)

Table E 6: Minimum number of tests in the sub-stage of Mobile/Stationary Grinding and Mixing Facility in the respective audit interval

#### E 4.11.5 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 % to ≤ 0.9 % GMO</b>		
Case-by-case evaluation	Can the GMO contamination be traced back to your production system? (e.g. dual production or change of feed)	<u>Yes</u> : Check whether the actions taken (cf. Chapter E 3.4) are adequate and properly implemented.  If not, continue in accordance with the procedure established in Chapters E 3.6 and E 3.9.

<sup>9</sup> Or in accordance with a recognised VLOG-equivalent standard

		<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 E 3.4) are not adequate and must be revised.
		<u>No</u> : (No systemic cause): No action needed.
> 0.9 % GMO		
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in Chapters E 3.6 and E 3.9.	

Table E 7: Evaluation of Test Results

#### E 4.11.6 Reduction of the Scope of Testing after Changing Feed in Group Organisations

If the business regularly switches from “Ohne Gentechnik” feeding to feeding with feed subject to compulsory labelling and participates in the VLOG system via a group organiser, the scope of testing may be reduced under the conditions explained below.

The reduction refers exclusively to testing after feed switching. The number of tests required for incoming goods or when using grinding and mixing facilities must not be reduced.

Before the scope of testing can be reduced, the functionality of the switching system must be documented by the group organiser:

- At least one test result from switching must be available for each site with regular feed switching. The test results must come from a current feeding system and meet the requirements of the current VLOG Standard.
- After receiving the test results and, if necessary, other documents, the certification body will decide whether the group may claim the reduced scope of testing. The decision must be documented.

The switching system must be continuously validated:

- At least one test after each feed switching must be carried out each calendar year in at least 25 % of the sites with regular feed switching.
- At least one sample must be taken and analysed each calendar year by a VLOG certification body from at least 5 % of the sites with regular feed switching after such feed switching has been carried out. These tests can be counted towards the 25 %.
- Each switching, including any measures taken to avoid contaminations must be documented in writing.
- In the event of positive test results, the certification body (if necessary, upon agreement with VLOG) will decide in each individual case whether an individual business or the entire group may continue to use the reduced scope of testing.

If new farms/sites for which the scope of testing is also to be reduced are included in the group, at least one test result from the feed change must be submitted per new site.



*Explanation: A flow chart of this process is available in Annex (7).*

## **E 4.12 Outgoing Goods Inspection, Labelling on Bills of Lading**

It must be ensured that only such products and animals that meet in full the requirements for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal (products) leave the business.

VLOG certified products/animals must be labelled for each individual product/animal and/or group on all bills of lading using the wording “VLOG” or the “Ohne GenTechnik” seal.

If no waybills/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.

## **E 5 Specific Requirements for Plant-based Feed Manufacturing**

These requirements only apply to the cultivation of feed in EU countries in which the cultivation of genetically modified plants or the release for research purposes is permitted or known.

### **E 5.1 Incoming Goods Inspection of seeds and seed stock (KO)**

When goods come in, it must be ensured that all seeds and seed stock for the production of feed for internal farming purposes are exempt from labelling under Directive 98/95/EC.

The exemption from labelling must be proven based on declarations/seed labels.

The feeds produced internally must be documented in the attachment GMO cultivation of the facility description (cf. Chapter E 3.2).

### **E 5.2 Segregation of Goods Flows/Exclusion of Contamination (KO)**

GMO contaminations from GMO cultivation and/or GMO releases for research purposes into feed produced internally must be prevented. It must be periodically verified whether GMO cultivation or GMO releases for research purposes are taking place in the immediate vicinity of the fields and it must be evaluated whether this is affecting the operation's own crops and, if applicable, whether corresponding cultivation distances are met.

These individual and risk-specific process steps must be documented for each operation with a separate proof of adequate logistical measures (e.g. spatial, temporal separation) and their efficacy reviewed as part of the self-monitoring process.



*Explanation: If the facility description contains all points, no separate document will need to be created.*

## **E 6 Specific Requirements for Animal Transport, Livestock Trade**

These requirements only apply in combination with the general requirements for the Agriculture stage.



## **E 6.1 Animal Transport Overview**

The business must fully document the types/categories of VLOG animals to be transported as well as the transport capacity in the facility description and keep this up to date.

## **E 6.2 Incoming Goods Inspection of Animals (KO)**

At goods receiving it must be ensured that all VLOG animals meet the following requirements:

- “VLOG” quality is to be confirmed for every delivery by the supplier on the waybills/animal transport documents for each individual animal and/or group.
- For every delivery operation, the VLOG certification and/or incorporation into a group certification (written verification by the certification body of the group organiser) for the area of applicability of the animal species/animal category is to be verified (at least at initial purchase and then once per calendar year).

## **E 6.3 Segregation of Goods Flows, Exclusion of Contaminations and Swapping (KO)**

### **E 6.3.1 VLOG animals**

All employees must be aware of the VLOG status of the individual animals, from acceptance through conveyance/transport, to final delivery.

VLOG animals are always conveyed and/or transported separately from Non-VLOG animal

The following exceptions are possible:

- Animals/animal categories with identification of individual animals (e.g., cattle ear tags with a unique ID number for each animal, marking stamp):
  - When accepting animals, the animal or farm identification must be checked; only properly identified animals are accepted.

### **E 6.3.2 Feeding of Animals**

The following requirements only apply to animal transporters/livestock traders that use feed:

- Spatial and/or temporal separation of goods flows must be utilised to ensure that feed subject to mandatory labelling is never fed to VLOG animals.
- All actions set forth in Chapter E 3.4 must be carried out and documented. It must also be documented where any residual quantities of feed that requires labelling were moved to.



# **“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.



# **“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
<p><b>Food preparation:</b> 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.</p> <p><b>Food processing:</b> 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).</p>			
Food of animal origin/ingredients	<p>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.</p> <p>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).</p>	No relevant areas	<p>G 1 - G 2, G 4</p> <p>H 1- H 2</p>
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

	<b>Certification required according to VLOG Standard</b>	<b>Certification not required according to VLOG Standard</b>	<b>Standard requirements</b>
	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
<b>Transport, Storage and Trans-shipment as a service and Food Retailing are at the Logistics stage (cf. Part B).</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<sup>1</sup>.

- 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.

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<sup>1</sup> 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](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](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

**i** *Explanation: The minimum quantities referred to relate to entire grains and/or beans. For raw materials that exhibit better homogeneity (e.g. soya protein concentrate), smaller weighed portions may be used in coordination with the responsible laboratory and the client.*

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

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

The client for the GMO testing must check the VLOG recognition of the commissioned laboratory regularly, at least once per calendar year.

When commissioning a laboratory, the following information must be indicated in the order or other documents having similar effect, and submitted to the laboratory:

- GMO testing order according to VLOG requirements
- Composition of the sample:
  - If containing soy, maize/corn, rapeseed/canola and/or rice 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.

**i** *Explanation: [Annex 3 of the Guideline for Laboratories](#) provides guidance regarding the order form, which contains all the minimum information that the laboratory must have to test VLOG samples.*

### 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 <sup>2</sup>
0	2
1	6
2	12

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

<sup>2</sup> 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
<b>GMO not verifiable or <math>\leq</math> limit of detection (generally 0.1% GMO)</b>	
Labelling compliant, permissible for VLOG-production	No action needed
<b>&gt; Limit of detection (generally 0.1% GMO)</b>	
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](https://www.ohnegentechnik.org/risik-prone_ingredients)



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

## **Part H - Retail - Sale of Bulk Food of Animal Origin**

**Version 23.01**

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## Part H: Retail Stage - Sale of Bulk Food of Animal Origin

In this section the requirements for the Retail Stage - sale of bulk food of animal origin in retail is described, the certification of which is done within the scope of retail group certification. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

### H 1 Stage Definition and Mandatory Certification

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<b>Retail:</b> Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.			
<b>VLOG retail group:</b> A VLOG retail group is a combination of branch operations (the so-called retail group members) for the purpose of VLOG group certification in retail.			
<b>Retail group organiser, hereinafter group organiser:</b> Business in a VLOG retail group having responsibility for a risk management that includes the retail group members. In VLOG retail group certification, certification is to be issued through the retail group organiser, i.e. the group organiser receives the certification for the VLOG retail group.			
<b>Retail group member, hereinafter group member:</b> Branch/site contractually integrated into a VLOG group.			
	For bulk goods of animal origin at a central distribution facility and counter sales, labelled with the "Ohne GenTechnik" seal	No relevant areas	H 1 - H 2

Table H 1: Stage Definition and Mandatory Certification

## H 2 Requirements for Group Organisers and Group Members

### H 2.1 Standard Usage Agreement with VLOG

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

### H 2.2 Group description and members list

#### H 2.2.1 Group Description (see Annex 27)

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:

An organisational chart of the business including details of responsibilities and a deputy plan to cover for absences for the operating procedure relevant to "VLOG".

- Persons in charge of the group organisation at the group organiser, including the persons' contact information and provisions regarding deputies
- Member list: A list and description of the activities of the retail group members with information about whether the purchase of "Ohne Gentechnik"/"VLOG" food is centralised or decentralised
- Information on whether traceability can be ensured up until sale to the customer or up until the service counter<sup>1</sup>
- A list and description of the outsourced processes (e.g. external service/job order production), 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, crisis management, etc.*).
- List of all authorised suppliers of "Ohne Gentechnik"/"VLOG" food and ingredients
- 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).



*Explanation: The designation of responsibilities within the organisational chart, within the branches may be linked to functions/job descriptions.*

*If the VLOG retail group establishes a central sales concept for all branches which is implemented in an identical manner by all the branches, it is sufficient if a single description of the group is prepared. Deviating characteristics of individual branches are to be documented correspondingly in the group description.*

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<sup>1</sup> If, for example, counter staff make incorrect PLU entries at checkout at a particular branch, traceability can only be ensured up until the service counter.

*The documents to be submitted to the auditor can be made available electronically. At the request of the business, all documentation other than the product and member list may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents.*

### **H 2.2.2 Members list**

A complete and up-to-date members list must be available.

A list of products, i.e. an overview or specifications, if applicable, for bulk “Ohne Gentechnik” goods offered by the business, including consideration of re-working, is to be on file for each member.

For further processing or the use of further ingredients (e.g. marinades, mixed spices) a list of all formulations with quantity- or weight-related information on ingredients and components is to be on file for each member, including consideration of re-work.

The group organiser must immediately notify the certification body of changes to the members list.



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

## **H 2.3 Contractual Binding of the Group Members (KO)**

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

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

## **H 2.4 Risk Management (KO)**

### **Risk analysis**

A documented risk analysis is to be submitted for all relevant raw materials, products, procedures and processes for which the group organiser is responsible. This must include evaluation of the risks for “Ohne Gentechnik” labelling (analogous to the HACCP concept).

The risk analysis includes at least:

- Raw materials and products for the “Ohne Gentechnik”/“VLOG” area
- Handling of raw materials and products that meet the requirements for “Ohne Gentechnik”/“VLOG” labelling, and raw materials and products that do not meet the requirements for “Ohne Gentechnik”/“VLOG” labelling
- Cleaning and disinfection procedure
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Sales/Declaration
- Other business-specific items if 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.

## H 2.5 Approval of Suppliers and Articles

A system must be in place for approval of suppliers and articles. The ordering of bulk and packaged “Ohne Gentechnik”/“VLOG” goods is to be transparent.

For bulk “Ohne Gentechnik”/“VLOG” goods, the following documents are to be available:

- List of suppliers
- List of products
- Lists of raw materials and specifications

There must be a documented procedure for clearing formulas and formula changes.

## H 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 VLOG requirements (see Chapter A 8).

- A documented check of the “VLOG” label is to be performed on packaging and delivery slips and/or invoices.
- The Supplier's certification is to be checked.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.
- For non-VLOG-certified raw materials of non-animal origin, there must exist a certificate from the supplier stating that such raw materials are GMO-free or exempt from labelling in accordance with Annex (1).

## H 2.7 Segregation of Goods Flows/Exclusion of Contamination (KO)

Physical and/or temporal segregation of the goods flows must guarantee that at no time products not suitable for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal not come into contact with the goods flows of products destined for “VLOG” labelling or 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. This applies, in particular, when goods are sent from the central office to the individual branches. In this case, “VLOG” goods must be clearly identifiable as such.



*Explanation: The goods must be segregated physically (e.g. using shelves, crates, or trays) during storage, handling, and presentation/sale, as well as through clear and seamless labelling of the “Ohne Gentechnik”/“VLOG” raw materials/semi-finished products/finished products.*

*Joint storage of bulk “Ohne Gentechnik”/“VLOG” goods with bulk goods not suitable for “Ohne Gentechnik” labelling is not permitted. Clear segregation, e.g. using different containers, is mandatory.*

*All reusable devices and containers used for the processing, presentation and storage of “Ohne Gentechnik”/“VLOG” products must be prepared prior to being used for “Ohne Gentechnik”/“VLOG” products such that the possibility of commingling is excluded.*

## H 2.8 Processing

Binding formulations, stating quantities and weights, are to be documented for all self-processed “Ohne Gentechnik”/“VLOG” products.

The formulations only contain ingredients that meet the requirements for the production of “Ohne Gentechnik” products in accordance with the VLOG Standard.

## H 2.9 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).

## H 2.10 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 H 2.13)
- Labelling of affected raw materials and products
- Notification of the suppliers and group organiser and/or group member
- 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.

## H 2.11 Labelling

Only price tags or labels of products that meet the requirements of the VLOG Standard may be marked as “Ohne Gentechnik” or with the “Ohne GenTechnik” seal.

## H 2.12 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 can 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<sup>2</sup>

The sale, refinement, write-offs, and inventory adjustments of bulk “Ohne Gentechnik”/“VLOG” goods must be documented in the business item by item and with traceable and verifiable quantity information. The labelling system must be defined and clearly recognisable.

## H 2.13 Crisis Management (KO)



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

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” raw materials/products. This procedure is to be implemented, must take into account all branches, and has to comprise, at a minimum:

- 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:
  - the certification body using the VLOG 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.

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<sup>2</sup> If, for systemic reasons, traceability can only be ensured up until the service counter and not up until sale to the customer (e.g., due to incorrect PLU entries by counter personnel), 10% of the branches will be audited unannounced each calendar year.

## H 2.14 Corrective Action, Ongoing Improvement Process

If non-compliant 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 group organiser is responsible for the timely implementation of corrective actions by the group members. Their effectiveness is reviewed within a reasonable period. Both are to be documented.

## H 2.15 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not allowed.

All documents relating to the “Ohne Gentechnik”/“VLOG” labelling are to be retained for at least the following period, unless statutory provisions require a longer retention period: at least two years.



*Explanation: Documents that must be retained include bills of lading, supplier declarations, records of product and goods flows (incl. rework), training documents, etc.*

## H 2.16 Internal Audits

Each calendar year, the group organiser must perform an internal audit in the business of the group organiser and all branches respectively. These audits must cover all requirements according to the Standard for the Retail 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.

In the scope of the internal audit, at least two risk-based random sample checks are to be performed each calendar year for goods tracing, incl. quantity comparison, and the results are documented. Compound food products are also taken into account, if produced by the business or at its branches.

The following additional points are to be checked:

- “Ohne Gentechnik”/“VLOG” labelling in the business
- Currentness and implementation of process and work instructions