

Revision Information – Agriculture, Group Organisation Agriculture VLOG Standard Version 23.01 as of 01 January 2023

Verband Lebensmittel
ohne Gentechnik e.V. (VLOG)



Preamble

In this Revision Information, the main changes in content of the VLOG standard version 23.01 compared to version 22.01 are presented in compact form. A more detailed overview can be found in the Revision Document.

Editorial changes, which were made in the context of the restructuring of the standard, but which do not entail any changes in content, are not indicated (e.g. rewordings, correction of duplications, deletions).

General Changes

- Separation and publication of the standard in 9 specific stand-alone parts, instead of as one overall document as was previously the case. This makes it easier for businesses to find exactly the information that is relevant to them.
 - Part A: General
 - Part B to H: Specific parts for each stage
 - Part Z: Certification
- Use of the word contamination, where appropriate, as a generic term for mixing, carry-over, commingling and swapping
- Change of the term "Non-GMO" production to VLOG production in the context of certification
- Attaching of the glossary, the overview of the annexes as well as the data protection & privacy notice to the end of Part A: General

Part A - General

A 5 Scope of Application

Addition:

- “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.”

Part A (General)

A 6 Structure

Inclusion:

- Figure of the structure of the VLOG Standard

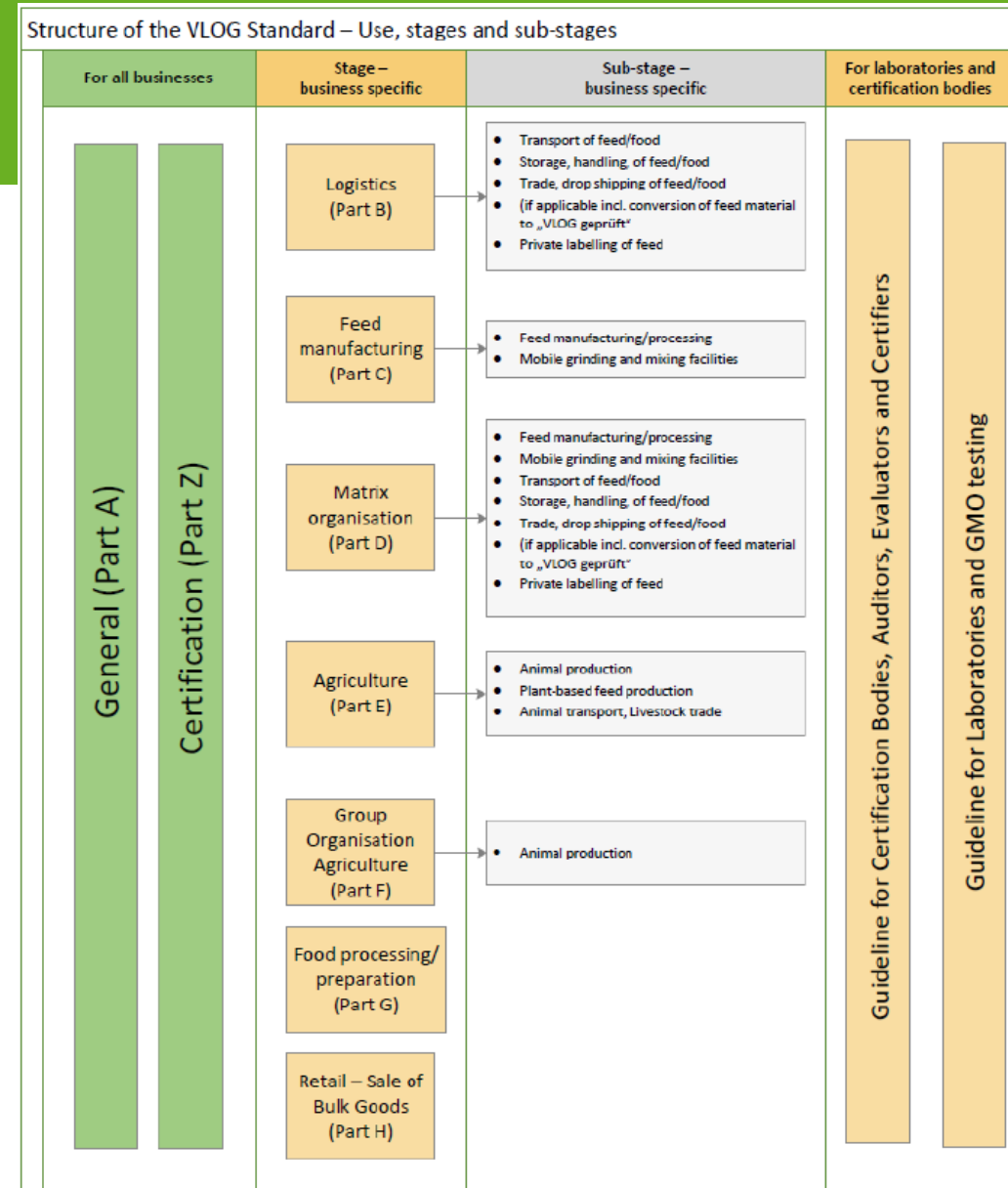


Figure A 1: Structure of the VLOG Standard

A 8.2 Specific Requirements for Feed

Inclusion:

- Contents taken over from the Guideline for Monitoring GMOs in Feed and the formerly chapter A 1.3.2 (EC Genetic Engineering Implementation Act (EGGenTDurchfG)).

A 8.3 Specific Requirements for Food

Deletion (due to the revision of the EU-organic production-regulation):

- „In cases where necessary additives such as vitamins are demonstrably not available in the market in “Ohne Gentechnik” quality, additives produced by GMOs may be used. Prerequisite for this exception is that these substances be listed by the EU Commission according to the procedure provided by Regulation (EC) No. 2018/848.“

Part Z - Certification

Part Z (Certification)

The VLOG "Ohne Gentechnik" Production and Certification Standard is composed of several parts. Newly added in Version 23.01 is Part Z: Certification.

- Description of the various possibilities and associated processes of VLOG certification as well as the resulting requirements for (future) VLOG-certified businesses and VLOG-recognized certification bodies.
- The contents are taken from chapters and paragraphs of the former chapter A and the stage-specific chapters B - H. Partially, text passages have been summarized, concretized and reworded. All changes can be found in the VLOG standard with marked notes or in the detailed revision document.
- In the following, only essential changes in content are presented.

Part Z (Certification)

Z 3.4 Audit Frequency

Change

- Stage Agriculture:
 - The audit frequency for individually certified agricultural businesses has been adapted to the audit frequency for agricultural group members. The audit frequency now also depends on the respective risk class of the business

Inclusion

- Requirements for external service providers

Part Z (Certification)

Z 3.6 Performance of the Audit

Addition

- Paragraph Introductory meeting:
 - **Checking whether there is a Standard Usage Agreement with VLOG**
- Paragraph 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**

Z 3.7 Audit Documentation

Addition:

- **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.**

Part Z (Certification)

Z 3.8 Evaluation of Compliance of the Requirements

Deletion:

- Grading criterion "Risk

Addition:

- Addition: A KO requirement may not be graded N.A in most cases.

Z 3.10 Audit Result

Inclusion:

- Column „**Effects on Labelling and Marketing**“

Part Z (Certification)

Z 3.11 Evaluation, Review by the Certification Body

Specification:

- “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.”

Z 4.3.1 Certificate

Inclusion:

Paragraph Group Organisation – Agriculture, – Retail:

- **“The certification body must also give the group organiser the membership list, including the last routine audit date.”**

Part E - Agriculture

E 1 Stage Definition and Mandatory Certification

Specification of the headline:

- Rearing of animals → Rearing, sale and outsourcing of animals

Change:

- Cultivation of feed:
 - Certification required: **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.**
 - Certification not required: **In EU countries in which the cultivation and the release of genetically modified plants for research purposes is prohibited by law.**
- Sub-stage Animal transport/livestock trade:
 - For **commercial** animal transport of VLOG animals, provided that the following requirements are fulfilled

Part E (Agriculture)

E 2 Criteria for Risk Grading

Inclusion:

- Grading criterion livestock transport/livestock trade

E 3.1 Standard Usage Agreement with VLOG

Chapter introduced

E 3.4. Risk Management

Inclusion:

- The risk analysis includes the mixing and interchange of VLOG animals and non-VLOG animals

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

Inclusion Explanation:

- “The facility description must document the commissioning of external service providers and the joint use of machines and facilities.”

Inclusion:

- Requirements for the commissioning of external service providers from Part A have been included, as well as requirements for the joint use of machines and facilities.

Part E (Agriculture)

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

Inclusion:

- The process includes: Clarification of whether an incident has occurred (cf. Chapter E 3.9)

Change:

- “Feed test results are to be evaluated in accordance with Chapter E 4.11.5.”

E 3.9 Crisis Management (KO)

Inclusion Explanation:

- Incidents are defined on the incident sheet (cf. Annex (33)).

Addition:

- Regulation for immediate notification of the certification body **using the VLOG Incident Sheet (see Annex (33))**“

E 3.11 Documentation and Retention Period

Addition Explanation:

- “In accordance with the Guideline for Monitoring GMOs in Feed, feed-(regarding GMO) related documents must be retained for five years.”

E 4.2 Risk-prone Feed

Text and footnotes transferred to table.

Change:

- Feed material from sugar beets and compound feed that contains sugar beets or was made from them in compliance with the following conditions:
 - Cultivation and if applicable, processing, in the EU or Switzerland
 - For each campaign, there is a meaningful confirmation from the producer that only non-labelled sugar beets are processed.

E 4.11.2 Sampling and Testing Frequency, Retention of Reference Samples

Addition in paragraph Sampling frequency

- „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). „

Inclusion paragraph “Sampling” (Content moved from former Part J)

E 4.11.5 Evaluation of Test Results

Chapter introduced

- Contents from Annex (5) transferred. Addition of the concrete procedure and indication of the limit values for feed not subject to compulsory labelling

Part E (Agriculture)

E 5 Specific Requirements for Plant-based Feed Manufacturing

Inclusion:

- “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)

Addition:

- “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.**”

Part E (Agriculture)

E 6 Specific Requirements for Animal Transport, Livestock Trade

Change:

- These requirements only apply in combination with the general requirements for the Agriculture stage. (Chapter E 3).

E 6.1 Animal Transport Overview

Chapter introduced:

- Documentation of the VLOG animals to be transported in the facility description

E 6.3.2 Feeding of Animals

Inclusion:

- •Chapter for animal transporters/livestock traders that use feed.

Part F – Group Organisation Agriculture

Part F (Group Organisation Agriculture)

F 2.2.4 Facility Description

Introduced as separate Chapter

Addition:

- “Updated facility descriptions must be available at the facilities of group members.”

F 2.4 Risk Management (KO)

Addition:

- External service providers must be taken into account in the risk analysis.
- Addition: Risk management must be reviewed for efficacy

Part F (Group Organisation Agriculture)

F 2.6.4 Evaluation of Test Results

Chapter introduced

- Contents from Annex (5) and Annex (6) transferred. Addition of the concrete procedure and indication of the limit values for feed not subject to compulsory labelling

F 2.8 Handling of Non-compliant Feed, Products and Animals (KO)

Addition:

- The procedure must include clarification of whether an incident has occurred.
- Feed test results are to be evaluated in accordance with Chapter F 2.6.4

Part F (Group Organisation Agriculture)

F 2.10 Crisis Management (KO)

Inclusion Explanation:

- Incidents are defined on the incident sheet (cf. Annex (34)).

Addition:

- Regulation for immediate notification of the certification body using the VLOG Incident Sheet (see Annex (34))“

Part F (Group Organisation Agriculture)

F 2.11 Corrective Action, Ongoing Improvement Process

Addition:

- “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

Addition Explanation:

- “In accordance with the Guideline for Monitoring GMOs in Feed, feed- (regarding GMO) related documents must be retained for five years.”

Glossary

Glossary - Definitions of terms

Additions:

- Group member

Inclusion:

- Standards recognised as equivalent
- Young cattle
- Calves
- Inter-facility use of machinery and equipment
- Contamination
- VLOG matrix/matrix organisation

Glossary - Definitions of terms

Deletions:

- K.O. criterion (due to inclusion in Part Z)
- Conversion of feed materials to “VLOG geprüft” quality (due to sufficient definition in Part B)

Concretisations:

- Storage
- Matrix member
- „Ohne Gentechnik“
- Private Labelling (feed)

Annexes - revised in content

Annex	Revision
(1) GMO-Free Certificate	<ul style="list-style-type: none">• Updating of the EU-organic production-regulation to Art. 3 No. 60/65 of Regulation (EU) 2018/848
(10) Dealing with Deviations and Breaches	<ul style="list-style-type: none">• Deletion of the criterion "risk" and its effects
(11) VLOG Certificate Template	<ul style="list-style-type: none">• Update Version VLOG Standard
(12) Areas of Application of VLOG Certification	<ul style="list-style-type: none">• Deletion of the introductory sentence• Deletion: Mineral feeds• Addition: Cattle – dairy cows & offspring, Cattle – suckler cows & offspring (incl. footnote)• Addition: Slaughtering (rabbits), Cutting (rabbits)
(13) Facility Description Logistics	<ul style="list-style-type: none">• Change: Subcontractors/contract processors to External Service Providers• Addition: Trading of feed: Trade and transport exclusively without (interim) storage
(15) Facility Description Feed Manufacturing	<ul style="list-style-type: none">• Deletion: Mineral feeds• Change: Subcontractors/contract processors to External Service Providers
(20a) Facility Description Agriculture - Attachment GMO cultivation	<ul style="list-style-type: none">• Change: GMO cultivation or the release of GMOs for research purposes is permitted or known.

Annexes - revised in content

Annex	Revision
(25) Facility Description Food Processing/-Preparation	<ul style="list-style-type: none">• Change: Subcontractors/contract processors to External Service Providers
(31) Incident Sheet Feed Manufacturing and Logistics	<ul style="list-style-type: none">• Addition: Certification status of the supplier
(32) Incident Sheet Matrix organiser Feed Manufacturing and Logistics	<ul style="list-style-type: none">• Addition: Certification status of the supplier
(33) Incident Sheet Agriculture and Animal Trade	<ul style="list-style-type: none">• Addition: Certification status of the supplier
(34) Incident Sheet Agricultural Group Organisation	<ul style="list-style-type: none">• Addition: Certification status of the supplier
(35) Incident Sheet Food Processing/Preparation, Logistics and Retail	<ul style="list-style-type: none">• Addition: Certification status of the supplier

Annexes - changed in structure but not in content

Annex	Revision
(14), (16), (19), (22a), (22b), (24), (26), (28), (29) Checklists	<ul style="list-style-type: none">• Addition: Cover page• Adaptation to the new structure of the VLOG Standard
(22a), (22b) Checklists	<ul style="list-style-type: none">• Split into the checklists Agriculture & Livestock Trade/Animal Transport
(20c) Facility Description Animal Transport/Livestock Trade	<ul style="list-style-type: none">• Renaming of former Annex (21)
(30) Grinding and Mixing Protocol for Grinding and Mixing Facilities	<ul style="list-style-type: none">• Renaming and partially reworded

Annexes omitted

Annex	Revision
(5) Handling of Positive Test Results (feed)	<ul style="list-style-type: none">• Deletion due to inclusion in respective parts
(6) Handling of Positive Test Results (food)	<ul style="list-style-type: none">• Deletion due to inclusion in respective parts
(8) VLOG Group Certification Process at the Agriculture Stage	<ul style="list-style-type: none">• Deletion due to inclusion in Part Z
(9) VLOG Matrix Certification Process Logistics and Feed Manufacturing	<ul style="list-style-type: none">• Deletion due to inclusion in Part Z

Further information

[www.ohne gentechnik.org](http://www.ohne Gentechnik.org)

www.ohne gentechnik.org/standard

(VLOG-Standard all annexes, additional leaflets and information)



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