

Revision Information – Feed Manufacturing, Logistics and Matrix Organisation 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

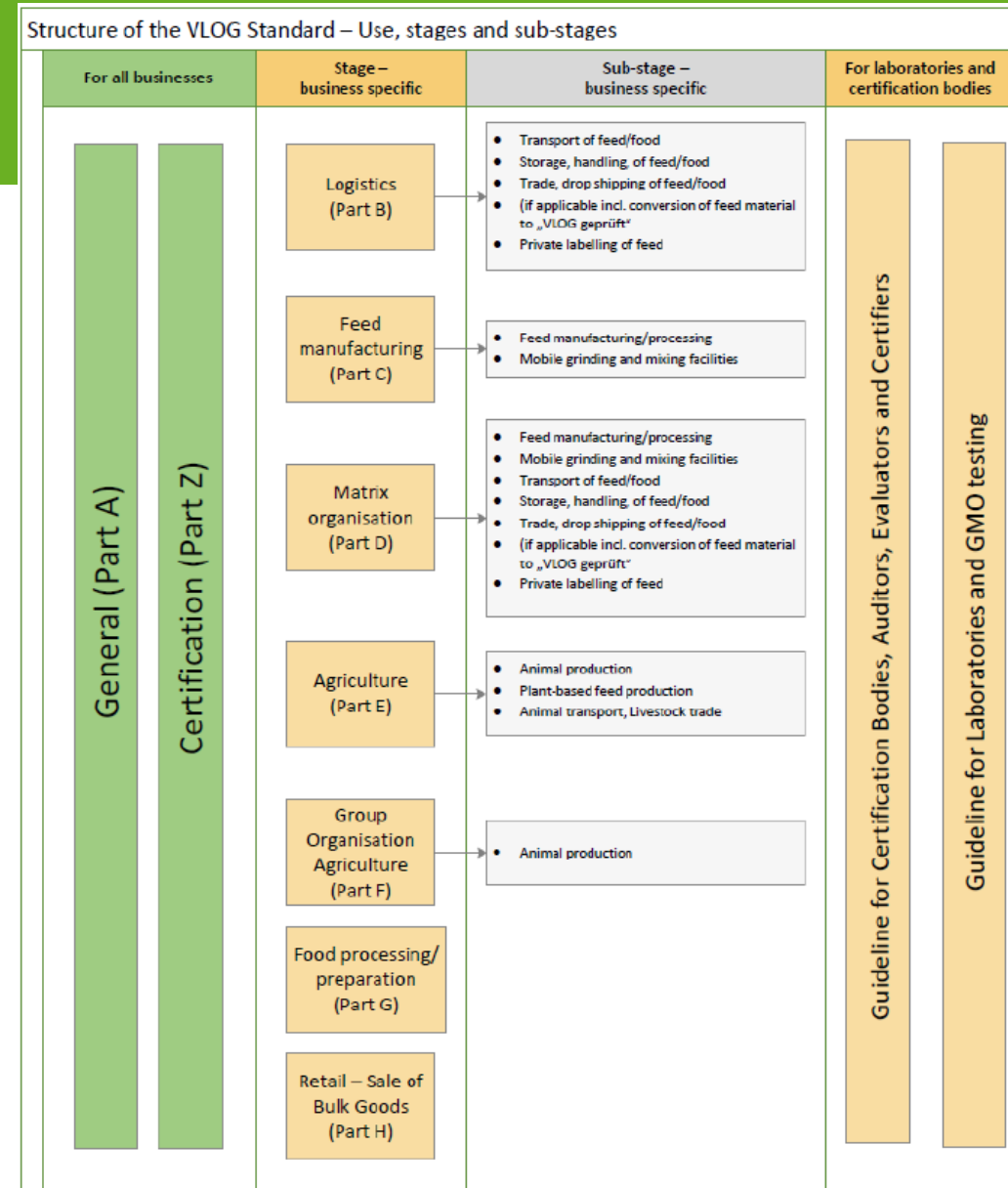


Figure A 1: Structure of the VLOG Standard

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 B - Logistics

Part B (Logistics)

Audit Frequency

Chapter omitted. Content moved to Z

B 2.1 Standard Usage Agreement with VLOG

Chapter introduced

B 2.4 Risk Management (KO)

Addition:

- External service providers must be considered in the risk analysis.
- The Risk management must be reviewed for efficacy

Part B (Logistics)

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

Addition:

- The procedure must include the clarification of whether an incident case exists.
- The evaluation of analysis results shall be carried out according with Chapter B 4.2.4.

B 2.12 Crisis Management (KO)

Inclusion Explanation:

- Definition of incidents in the incident sheet

Addition:

- Regulation for immediate notification of the certification body **using the VLOG Incident Sheet (see Annex (31) and (35))**

Part B (Logistics)

B 2.14 Documentation and Retention Period (V22.01: chapter B 3.13)

Addition:

- Documents related to the labelling with the "VLOG tested"/"Ohne GenTechnik" seal must be kept.

Addition Explanation:

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

B 4.2.4 Evaluation of Test Results

Chapter introduced:

- Content moved from Annex (5) and Annex (6). Addition of the concrete procedure and specification of the limit values for the non-labelling of feed and feed.

Part C – Feed Manufacturing

Part C (Feed Manufacturing)

Audit Frequency

Chapter omitted. Content moved to Z

C 2.1 Standard Usage Agreement with VLOG

Chapter introduced

Part C (Feed Manufacturing)

C 2.4 Risk Management (KO)

Addition:

- External service providers must be considered in the risk analysis.
- The Risk management must be reviewed for efficacy.

C 2.8 Handling of Non-Compliant Feed (KO)

Addition:

- The procedure must include the clarification of whether an incident case exists.
- The evaluation of analysis results shall be carried out according to Chapter C 3.1.4.

C 2.12 Crisis Management (KO)

Inclusion Explanation:

- Definition of incidents in the incident sheet

Addition:

- Regulation for immediate notification of the certification body **using the VLOG Incident Sheet (see Annex (31))**

C 2.14 Documentation and Retention Period

Addition:

- Documents related to the labelling with the "VLOG tested"-seal must be kept.

Addition Explanation:

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

Part C (Feed Manufacturing)

C 3.1.4 Evaluation of Test Results

Chapter introduced:

- Content moved from Annex (5). Addition of the concrete procedure and specification of the limit values for the non-labelling of feed.

C 4.3 Mixing Documentation and Mixing Protocols

Addition:

- “The mixing sequence and the individual mixtures per facility are to be documented **on a daily basis in chronological order.**”

Part D – Matrix Organisation Logistics and Feed Manufacturing

Part D (Matrix Organisation Logistics and Feed Manufacturing)

D 1 Stage Definition and Mandatory Certification

Specification:

- Listing of relevant terms and definitions in tabular form analogous to other parts

D 2.2.3 Facility description of sites

Introduced as separate Chapter

Addition:

- “A current facility description must be available at the sites of the matrix members (Annex 13 Logistics and/or Annex 15 Feed Manufacturing).”

D 2.4 Risk Management (KO)

Addition:

- External service providers must be considered in the risk analysis.
- The Risk management must be reviewed for efficacy.

D 2.6.5 Evaluation of Test Results

Chapter introduced:

- Contents taken from Annex (5) and (6). Addition of the concrete procedure and specification of the limit values for the non-labelling of feed.

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

Addition:

- The procedure must include the clarification of whether an incident case exists.
- The evaluation of analysis results shall be carried out according with Chapter D 2.6.4

D 2.11 Crisis Management (KO)

Inclusion Explanation:

- Definition of incidents in the incident sheet

Addition:

- Regulation for immediate notification of the certification body **using the VLOG Incident Sheet (see Annex (32))**

D 2.12 Corrective Action, Ongoing Improvement Process

Addition:

- “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

Addition:

- Documents related to the labelling with the "VLOG tested"/"Ohne GenTechnik" seal must be kept.

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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