

# "Ohne Gentechnik" Production and Certification Standard

## Version 23.01

Published on 1 September 2022 Obligatory as of 1 January 2023



With marked differences to V22.01 (marked notes)

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# "Ohne Gentechnik" Production and Certification Standard

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.

added

## 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.

added

## 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.

reworded

## A 4 Purpose of the Standard

changed

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.

added

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. Moreover, it assists businesses in developing a risk management system.

moved

The present Standard is intended for

- Producers, processors and traders of food who wish to label their products with an "Ohne GenTechnik" seal or the designation "Ohne Gentechnik"/"VLOG".
- Feed manufacturers and traders who wish to label their products with the "VLOG geprüft" seal or the word mark "VLOG geprüft".

In addition to agricultural businesses and logistics companies, certification under this Standard can also be extended to food producers and processors and feed manufacturers, separate from the aforementioned product labelling option ("Ohne GenTechnik" seal/"VLOG geprüft" seal).

## A 5 Scope of Application of the Standard

changed

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.

added

## A 6 Definition of the Stages in the Standard Structure

changed

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.

added

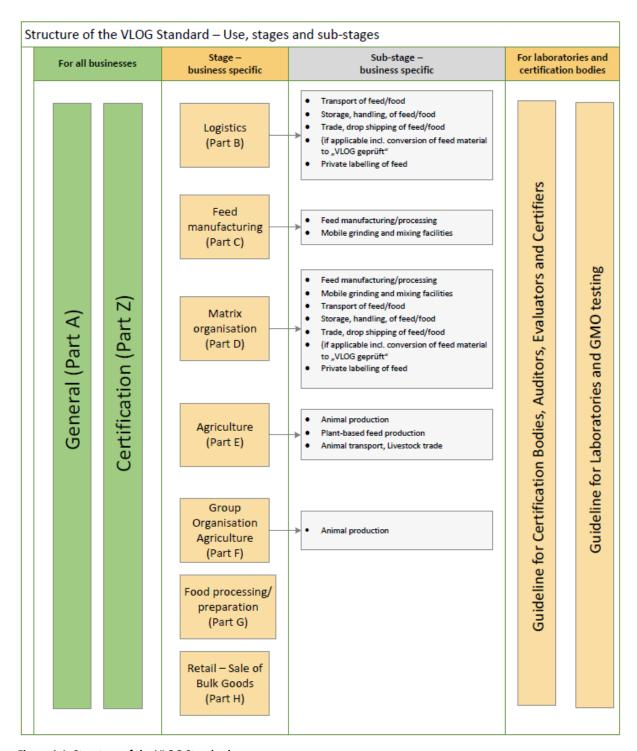


Figure A 1: Structure of the VLOG Standard

## 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 concerning genetically modified food and feed, dated 22
September 2003 and 1830/2003 concerning the traceability and labelling of genetically
modified organisms and the traceability of food and feed products produced from
genetically modified organisms, dated 22 September 2003 and the amendment to Directive
2001/18/EC

deleted

- EC Genetic Engineering Implementation Act (in short: EGGenTDurchfG) dated 22 June 2004 (Federal Law Gazette I p. 1244, last amended by Article 58 of Regulation of 31 August 2015, Federal Law Gazette I p. 1474)
- Regulation (EC) No. 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down the procedures in matters of food safety, Article 18 (1), dated 28 January 2002
- Regulation (EC) No. 619/2011 laying down the methods of sampling and testing for the official control of feed for genetically modified material for which an approval procedure is pending or the approval of which has expired, dated 24 June 2011
- Regulation (EC) No. 2018/848 of the European Parliament and of the Council on Organic production and labelling of organic products and repealing Regulation (EC) No. 834/2007 of the European Council, dated 30 May 2018
- Regulation (EC) No. 152/2009 of the European Commission laying down the methods for sampling and analyses for the official testing of feed, dated 27 January 2009
- Regulation (EU) No. 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No. 1924/2006 and (EC) No. 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No. 608/2004
- Directive 2001/18/EC of 12 March 2001 on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC

The following interpretations can provide assistance in implementing the VLOG Standard:

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)

added and changed

Statement no. 2016/01: <u>Guidelines for controlling genetic modifications in food products</u> – 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: <a href="https://www.ohnegentechnik.org/en/faq">https://www.ohnegentechnik.org/en/download-center</a>

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).

added

# A 8.1 Regulations (EC) No. 1829/2003 and 1830/2003 Basic Requirements for Food and Feed

changed

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.

added

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".

Contamination with approved GMO content < 0.1 % is generally considered as "technically unavoidable" or "adventitious".

deleted

Contamination present in a magnitude of > 0.1 % and  $\le 0.9 \%$  is considered as labelling-compliant if the business has installed and demonstrably implemented organisational measures to avoid introduction of GMO material.

#### **Assistance for labelling feed**

moved

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 "Guideline on controlling GMOs in feed" (http://www.ohnegentechnik.org/Leitfaden Futtermittel).

With regard to Example 4.b 1 in Annex 1 of the abovementioned Guideline, it is explicitly noted that the waiver of the requirement of GMO marking relates only to botanical contamination of a feed material. Carryover of GMO material during the production process in a feed plant may not be considered as botanical contamination with the resulting labelling requirements.

## A 8.2 Specific Requirements for Feed

### "Adventitious or technically unavoidable"

added

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.

moved

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:

added

- 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

moved

 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.

added and moved

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.

Feed for use in the system of "Ohne Gentechnik" production must not be subject to compulsory labelling pursuant to Regulation (EC) No. 1829/2003 or 1830/2003. Appropriate steps are demonstrably undertaken to avoid and prevent the presence of any genetically modified material (see "Guideline for the Control of GMOs in feed"). Feed additives must be taken into consideration for the labelling only if they are made from GMOs or GMO components and therefore must be labelled 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 8.4 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:

added

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

added

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 Programme Audits

changed

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

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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.

VLOG or a third party commissioned by VLOG will perform inspections, including required sampling, if applicable, within the scope of Verification Audits at the sites of licensees and VLOG certified businesses. The inspections may be performed in all areas of the business that are relevant to "Ohne Gentechnik" and/or "VLOG geprüft" production as well as at any transport, pre-processing, processing or packaging operations involved in the auditing and certification process, if applicable.

deleted

Verification audits may be performed with and without advance notice.

added

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

added

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 (see 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.

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Figure A 2: "Ohne GenTechnik" seal for food

#### Use of the "Ohne GenTechnik" seal outside of Germany

deleted

To use the German, or a translated version, of the "Ohne GenTechnik" seal, the requirements of the VLOG Standard must be met along with those pursuant to the national law of the country where the licensed product/product to be licensed is being placed on the market. Assessing the legality of using the "Ohne GenTechnik" seal outside of Germany is the sole responsibility of the licensee.

A suitable translation of the "Ohne GenTechnik" seal may be requested from VLOG. It is not permitted to use a translated version that was developed by oneself. Products may only be placed on the market with a translated seal designation following conclusion of a sub-licensing agreement between the licensee and VLOG. If such an agreement already exists, it must be supplemented with any new products that are to be labelled.

## 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.

An English version of the seal ("VLOG verified") is available. No other translations of the seal are permitted.

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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:** The administrative seat of a member operation. A general organisation which may consist of multiple sites/operating units.

deleted

**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.

added

**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

added

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

## Conversion of feed materials to "VLOG geprüft" quality: Through incorporation

- into the VLOG certification,
- into a business' internal risk management (Chapter B 3.3 and B 7.1) and
- in particular, into a GMO monitoring system in accordance with Chapter B 7.2 and C 3.3

purchased feed materials can attain "VLOG geprüft" quality at a feed dealer. Feed materials can also be processed (e.g. shredded, milled, pelleted).

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.

deleted

**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)). added

- 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.

added

**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.

**KO criterion**: A requirement which has a critical effect on "ohne Gentechnik"/ "VLOG geprüft" labelling in case on non-compliance.

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**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.

added

**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 (see 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".

added

"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 carry over 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.

changed

- 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.
- Upon request, the VLOG will provide a definition of the main production focus of small agricultural businesses that are not mentioned here.

deleted

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:

added

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 on behalf of a third party or storage in one's own external warehouses.

deleted

**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.

added

**"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.

added

## **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
- (20) (20a) Facility Description Agriculture

(20b) Facility Description Agriculture Beekeepers

(21) (20c) Facility Description Animal Transport/Livestock Trade

(22) (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

changed

changed

changed

added

**Literature** deleted

• Guideline for the Control of GMOs in feed (German: Leitfaden zur Kontrolle von GVO in Tierfutter – version of November 2011). Monitoring of the production, of handling, of use and of bringing to market of feed in connection with genetically modified organisms (GMOs). Policy guidelines for the implementation of legal regulations. 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 Federal Government and The Association of German Agricultural Investigation and Research Institutions (VDLUFA) – also available in English

- Sampling of feed for the test of GMO components authorised in the EU within the framework
  of an examination of compulsory labelling; compiled by the Working Group PCR Analytics of the
  Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes
  (VDLUFA), dated July 2010 available in German only
- Concept of test of genetically modified feed. Working paper of the Working Group PCR
   Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and
   Research Institutes (VDLUFA), dated February 2011 available in German only
- Praxishandbuch "Bio Produkte ohne Gentechnik" (Practical Handbook "Organic Products without Genetic Engineering" in German from the German Association of Organic Farmers, Food Processors and Traders (Bund Ökologische Lebensmittelwirtschaft BÖLW), Ökoinstitut and the Research Institute for Biological Agriculture (Forschungsinstitut for biologischen Landbau FiBL. <a href="http://boelw.de/themen/gentechnik/bioxgen/">http://boelw.de/themen/gentechnik/bioxgen/</a> available in German only
- Legal opinion (17 pages, in German) by [GGSC], a Berlin law firm commissioned by VLOG, dated
   23 November 2015 <a href="http://www.ohnegentechnik.org/ggsc\_stellungnahme\_fuetterungsfrist/-available">http://www.ohnegentechnik.org/ggsc\_stellungnahme\_fuetterungsfrist/-available</a> in German only

## **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 <u>VLOG Guideline for Certification Bodies</u>, <u>Auditors</u>, <u>Evaluators</u> and <u>Certification Bodies</u>.

## **Z 2** Types of Certification

moved from A 3.2

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

added

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

moved from D 1 and D 2 and reworded

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.

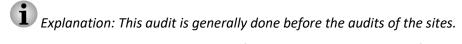
Explanation: Only one certification body may be commissioned for the entire matrix organisation. It is not permissible to retain multiple certification bodies for one matrix certification.

- 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.



- 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).

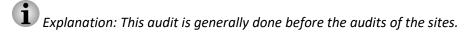
Without an initial audit by the certification body, a logistics site (resp. mobile grinding and mixing facilities) can only be accepted if this 33% criterion is still met after its acceptance within the respective calendar year. Newly added sites for feed manufacturing (except mobile grinding and mixing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



- 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**

moved from F 1 und F 2 and reworded

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:



**1** 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.



**i** 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.

 $oldsymbol{i}$  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**

moved from H 2 and reworded

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.



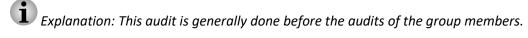
i Explanation: The described process must also be applied to new group members.

- 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.



- 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.
  - o 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

moved from E 2.2 and A 3.2 and reworded

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

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

Criterion	Requirement
Change of risk category	The risk category of all VLOG areas of application remains the same or is diminished. Alternatively, the risk category can be graded separately for the individual areas of application under certain conditions (cf. Chapter E 2).
Site/ operating unit	Sites/operating units of the new area of application were audited on site by a VLOG-recognised certification body in the previous VLOG-group/or routine audit.
Additional criteria for facilities that have hitherto been organised into a VLOG group or certified:	
Previous on-site audit by the certification body	The group member was already audited on site by a VLOG-recognised certification body.
Data approval by the previous group organiser	The group organiser agrees in writing to the use of the audit documents (current audit data) for the expansion certification in agriculture.

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

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

## **Z 3** Certification Procedure

## Z 3.1 Audit Types

moved from A 3.1

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

moved from A 3.3

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

moved from A 3.5 and reworded

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 facility description in the checklist by the auditor and evaluator, as necessary.

deleted

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

added

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

<sup>&</sup>lt;sup>1</sup> and/or group or matrix organizer, in the case of group or matrix certifications

## 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).

moved from A 3.5

added

moved from E 2.1 and reworded

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

## Z 3.3.2 Agriculture Stage

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

https://www.ohnegentechnik.org/risk grading agriculture.

#### **General**

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

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

<u>Grading a business with various areas of application</u> (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:

reworded

A business may only be graded into multiple risk categories if all of the following requirements are met:

deleted

- the business is a member of a VLOG group certification for one area of application,
  - the areas of application are completely separate from each other (completely separate facilities/feeding equipment/machines in contact with feed), and
  - all grading criteria in the following table are observed for each area of application

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

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<ul> <li>Only possible if all of the following criteria are met:</li> <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>	Feed subject to compulsory labelling, which can be swapped, is present at the site.  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.	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> .
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn	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.		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).
Certification status of risk- prone feed used in VLOG production (cf. Chapter E 4.2)	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		Risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.  Risk-prone feed is being used that has been certified pursuant to the VLOG Standard but

<sup>&</sup>lt;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
	also applies to oils used for dust binding in grinding and mixing facilities.		lost the certification status due to a violation of the certification obligations in the supply chain (cf. Chapter B 1 and C 1).
Use of grinding and/or mixing facilities	Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard.  Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.	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.  Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:  The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio³).  Measures to prevent contaminations with GMO are described in the QM manual of the facility operator.	Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard.  Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.  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).
Animal transport/livestock trade	The animals are not fed in the business/during transport.	The animals are fed in the business/during periods. In this case, the other risk-grading	• •

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

<sup>&</sup>lt;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.

moved from A 3.5

added

## 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.

moved from B 2.1, C 2.1, D 2.3, E 2.3, F 2.4, G 2.2 and H 2.2.1 reworded and converted to table

#### 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.

  | parts in table changed

**Audit frequency of routine** Specific requirement/note Stage audits Individual certification Logistics 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). Feed manufacturing Once per calendar year 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). i.e. at the latest in the third following calendar year of the last audit Risk Category 0 Within 3 calendar years Agriculture Risk Category 1 Within 2 calendar years i.e. at the latest in the second following calendar year of the last audit

Risk Category 2	Once per calendar year	Supplement – Animal transport/livestock trade sub-stage  If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit under the following conditions:  • Direct transport from the supplier to the buyer (e.g., the abbattoir), without intermediate stabling and/or feeding  or  • Unloading or trans-shipment between the starting point and the transport destination (e.g., at a collecting point) solely with respect to animals with individual identification and no feeding of VLOG animals.
Food Processing and Preparation	Once per calendar year	
Matrix Organisation in Logistics and Fee	d Manufacturing	
Matrix organiser	Once per calendar year	
Matrix site  Logistics and Mobile Grinding and Mixing Facilities Stages	Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
Matrix site  Feed Manufacturing stage (except for mobile grinding and/or mixing facilities)	Once per calendar year	
Agricultural Group Organisation		
Group organiser	Once per calendar year	
Group member risk category 0	Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
Group member risk category 1	Within 2 calendar years	i.e. at the latest in the second following calendar year of the last audit

Group member risk category 2	Once per calendar year				
Combination of individual certification and group certification in agriculture or combination of multiple group certifications with various areas of application per business:					
•	e business (cf. Chapter Z 3.3). Under cer	tion and is individually certified for another area of application, the audit interval tain conditions, different areas of application can be graded into different risk			
Group Organisation Retail					
Group organiser	Once per calendar year	If all the audit criteria, incl. original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.			
10% of the group members		The audits are announced.			
if centrally purchased, traceability up until sale to the customer must be ensured	Once per calendar year	If the audits are announced and the certification body concludes, based on its on-site audit, that traceability can only be ensured up until the service counter, 10% of the audits of branches in subsequent years will be unannounced.			
10% of the group members if centrally purchased, traceability up until the service counter must be ensured	Once per calendar year	The audit is unannounced.			
100% of the group members if products are purchased locally	Once per calendar year				
External Service Providers					
External service providers that are audited as part of the VLOG audit of the client	·				

Table Z 3: Audit Intervals

## Z 3.5 Planning of audits

moved from A 3.6

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)

added

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

#### Z 3.6 Performance of the Audit

moved from A 3.7

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

changed

#### **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>

added

#### 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

added

- 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

<sup>&</sup>lt;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.

The auditor is authorised to take additional samples and/or carry out other GMO tests in accordance with risks or in suspicious cases.

moved

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

## Z 3.7 Audit Documentation

moved from A 3.8

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.

added

## **Z 3.8** Evaluation of Compliance of the Requirements

moved from A 3.9

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.

moved

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

parts in table moved, changed and deleted

Grading	Description	points	Note
А	A Full compliance with a requirement		
В	Minor to moderate deviations from the requirement	5 points	
C Non-compliance or major deviation from the requirement		-10 points	

Grading	Description	points	Note
Risk	Major deviation or breach, meaning that a risk to "Ohne Gentechnik"/"VLOG geprüft" labelling cannot be ruled out	– <del>15 % of total</del> <del>points</del>	
ко	Requirements with a critical impact on "Ohne Gentechnik/"VLOG geprüft" labelling in case of noncompliance	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.  A KO requirement may not be graded N.A in most cases.
N.A.	Not applicable	-	If an auditor reaches the conclusion that a particular requirement is not applicable to the business, this requirement may be assessed as N.A. (= not applicable). A KO requirement may not be graded N.A in most cases.

Table Z 4: Evaluation of Compliance of the Requirements

## **Z 3.9** Determination and Handling of Corrective Actions

moved from A 3.9.1 and reworded

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.

Monitoring of the implementation of the corrective actions lies within the scope of responsibility of the certification body.

moved added

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. Chapter Z 3.10) and Annex (10) apply if the business is sanctioned and/or in connection with corrective actions.

## Z 3.10 Audit Result

moved from A 3.9.2, reworded and converted in table

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

parts in table reworded, moved, added and deleted

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
<ul><li>more than 75% of the maximum points</li><li>No KO grading</li></ul>	passed	Issuance of the VLOG certificate or inclusion in the VLOG group or VLOG matrix	<ul> <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> <li>More than 75 % of the maximum points</li> <li>No KO grading</li> <li>One risk grading</li> </ul>	passed/not passed	<ul> <li>Routine audit only: decision of the certification body about suspending the certificate, depending on the severity and relevance of the risk of grading</li> <li>VLOG certificate will not be issued until corrective actions have been implemented and reviewed</li> <li>Certification body decides whether a follow-up audit is necessary</li> </ul>	
Only for document audit (expansion certification in agriculture)  No KO grading  "A" grade for the facility description requirement	passed	Issuance of the VLOG certificate or inclusion in the VLOG group	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.

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
<ul> <li>less than 75% of the maximum points</li> <li>No KO grading</li> </ul>	not passed	<ul> <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> <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>	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.
One or more KO gradings	not passed	<ul> <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</li> </ul>	<ul> <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</li> </ul>

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
		lack of documentation, a document inspection can be performed instead. The decision whether a new routine audit or a document inspection must be performed is the responsibility of the certification body.  • Certification body must notify VLOG about the KO grading within 2 working days (does not apply to audit of group or matrix members who did not pass)	matrix/group. In this case, the marketing of food labelled "VLOG"/feed labelled "VLOG geprüft" will be prohibited only for the excluded sites/group members.

Table Z 5: Evaluation of audit results

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

## Z 3.11 Evaluation, Review by the Certification Body

moved from A 3.10

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.

added

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.

moved from A 3.7

## 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.

moved from F 2.2 and D 2.2

## Z 4 Certificate Issuance

moved from A 3.11

## 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

added

- 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.

Businesses or facilities undergoing initial certification are authorised to start shipping only after the issuance of the certificate.

moved

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

footnote converted in text

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**

moved from A 3.11.2

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). The scope of application of the certificate must be formulated pursuant to Chapter 0.

#### Area of application

moved from A 3.4 and reworded

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 VLOGcertified 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

moved from

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

A 3.11.2

- 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:

moved from D1, D2.2, F 2.2 and H 2.2 converted to table

## **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 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.

parts in table added

#### **Group Organisation - Agriculture, Group Organisation - Retail**

The VLOG certificate will be issued for the VLOG agricultural group and must contain the business name of the group organiser.

- For stage group organisation agriculture with the defined scope of applicability of animal production (cf. Annex (12)).
- For stage retail with the defined scope of applicability of bulk products (cf. Annex (12)).

Group members do not receive individual VLOG certificates.

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

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.

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

moved from D 2.2 and F 2.2

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.

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

added

https://www.ohnegentechnik.org/fileadmin/user\_upload/01\_unternehmen/e\_standards/e1\_der\_vlo g\_standard/Further\_Documents/Confirmation\_for\_group\_and\_matrix\_members\_writable.pdf

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 conformation.

## Z 4.4 Validity of the VLOG Certificate

moved from A 3.11.3 and converted in table

parts in table changed

#### All stages

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).

#### Exceptions to this are to be handled as follows:

#### **Logistics Feed Manufacturing Stage**

<u>VLOG-certified mobile grinding and mixing facilities simultaneously certified under the guidelines of the QS system</u>:

• 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).

#### **Agriculture Stage**

**Individual VLOG-certified businesses:** 

• 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.

<u>VLOG-certified livestock traders/transporters which are simultaneously certified under the guidelines of the QS system:</u>

• If the VLOG audit interval is adjusted to the audit interval of the QS controls (maximum of 2 or 3 years), the validity may extend no longer than the end of the second or third following year (relative to the date of the VLOG audit).

Table Z 7: Validity of the VLOG Certificate

#### Z 4.5 Withdrawal of the Certificate

moved from A 3.11.4

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

Added and changed

- 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

moved from A 3.11.5 and reworded

#### 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:

- 1. 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.

#### <u>Transferring Certification in the Event of a Change of Certification Body</u>

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.

added

## **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 <a href="https://www.ohnegentechnik.org/SRAE">https://www.ohnegentechnik.org/SRAE</a>.

Parts in table added and changed

Colorana	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Feed/Food	For transport means conveying goods from one place to  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 statements conditions is accurate met:  • Transport is not integrated into the risk management of a VLOG-certified business.  • No agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the carrier and the certified business.	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 statements conditions are accurate met:  Order placed by a VLOG-certified business  Transport is integrated into the risk management of a VLOG-certified business. There is adequate proof of integration.  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)	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 commingling contamination or tampering.	B 1 - B 2		
<del>own external wa</del>	Sub-stage Storage/handling: Storage comprises the service of temporary storage of food and/or feed on behalf of a third party or storage in the business' own external warehouses. Handling comprises all activities 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 commingling 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 commingling contamination or tampering.	B 1 - B 3		

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
to drop shippin		ng and reselling goods that are not produced at one's own factions are and the trader takes responsibility for storage, handling and	
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
	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.		B 1 - B 2, B 4
	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 commingling 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 commingling contamination or tampering.	B 1 - B 2, B 4

Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that:  The trader issues delivery slips of its own for certified goods with the "VLOG" label and/or  The trader commissions non-VLOG-certified carriers or the transport site is not included in the risk management of a VLOG-certified business	<ul> <li>For trading of sealed VLOG-certified food between two VLOG-certified businesses, provided that all of the following conditions are met:         <ul> <li>The goods are VLOG certified</li> <li>The originating processing business is listed on the delivery slips</li> </ul> </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 B1. 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> <li>For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.</li> <li>For trading of sacked/tamper resistant packaged food.</li> </ul>	B 1 - B 2, B 4

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
_	<b>Prop shipping</b> : Drop shipping refers to the trading method wher. The drop shipper does not take physical possession of the golden 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
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 commingling contamination or tampering.	B 1 - B 2, B 5, B 6
	<ul> <li>For sealed drop shipping of VLOG-certified food between two VLOG-certified businesses, provided that:         <ul> <li>The drop shipper issues delivery slips of its own for certified goods with the "VLOG" label and/or</li> </ul> </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>	For drop shipping of sealed VLOG-certified food between two VLOG-certified food businesses, provided that all of the following conditions are met:  The goods are VLOG certified  The originating processing business is listed on the delivery slips  The certified goods are labelled "VLOG" on the delivery slip  The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in	B 1 - B 2, B 5

Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
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	<ul> <li>accordance with B1. There is adequate proof of integration.</li> <li>After loading, the vehicle tank, container, etc. is sealed by employees of the originating issuing processing business</li> <li>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</li> </ul>	B 1 - B 2, B 5
<ul> <li>tanker), provided that at least one of the following conditions is not met:</li> <li>The goods are not VLOG certified</li> <li>The purchasing processing facility cannot verify that the goods exclusively come from VLOG-certified businesses</li> <li>The processing facility does not have currently</li> </ul>	<ul> <li>that all of the following conditions are met:</li> <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 business facility has currently valid</li> </ul>	
<ul> <li>valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)</li> <li>The carrier is not VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B1.</li> </ul>	<ul> <li>VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)</li> <li>The carrier is VLOG-certified or integrated included in the risk management of a VLOG-certified business in accordance with B1. There is adequate proof of integration.</li> </ul>	
	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).	

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements	
<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 <b>client's</b> (private labeller) specifications or the goods are purchased from the manufacturer 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

added

<sup>\* (</sup>Word mark or seal according to chapter A 10)

## Specific information about the Certification Procedure

moved to Z

## **Audit Frequency**

In the case of individual certification in the Logistics stage one routine audit per calendar year is performed.

Explanation: For matrix organisation in logistics and feed manufacturing the audit follows the requirements of Chapter D 2.3

## **Knock Out (KO) criteria**

deleted

#### The following KO requirements have been determined:

- Risk management (B 3.3)
- Segregation of the flow of goods/exclusion of commingling (B 3.5)
- Handling of non-compliant feed, raw materials and products (B 3.6)
- Traceability (B 3.8)
- Crisis management (B 3.11)
- Incoming goods inspection (B 4.1, B 5.1, B 6.1)

## B 2 General Requirements for Businesses

## B 2.1 Standard Usage Agreement with VLOG

added

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.

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 risk category, products and/or processes.

deleted

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.

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

added

- 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.)

added

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.

added

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

reworded and moved from A

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 onsite 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)

changed

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 carryover of 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.

changed

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)

added

- 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.

added

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.



- 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) or (35))

added

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))

added

- 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.

added

## **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.

reworded

#### **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:

 ${\sf added}$ 

- 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.

added

## 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

#### **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)

added

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)

The incoming goods procedure must ensure that all "VLOG" raw materials/products or "VLOG geprüft" feed meet(s) the requirements.

deleted

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 Chapter B 4.2.2 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 periods of sampling and GMO testing
- Description of the test procedure (commissioned laboratory, scope of testing cf. <u>Guideline for Laboratories</u>)

moved

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 no 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.

## B 4.2.2 Sampling and Commissioning a Laboratory

moved from J

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.

### **Handling of Positive Test Results**

Positive test results are to be treated according to Annex (6) (for food) and Annex (6) (for feed).

deleted

The handling of the affected feed, raw materials and products in the business must follow the specifications of Chapter B 2.7.

### 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).

moved from annex (5)

#### **Trading of VLOG feed**

Parts in table added and deleted

List of VLOG products at the site	Minimum sampling + testing in "VLOG geprüft" outgoing goods inspection <sup>12</sup> per calendar year		
List of all products at the site	Bulk "VLOG geprüft" feed	VLOG bagged goods	
No bulk feed subject to compulsory labelling at site	up to, <b>including</b> 10,000 t/year: 1 sample + test > 10,000 to 50,000 t/year: 2 samples + tests > 50,000 to 100,000 t/year: 4 samples + tests > 100,000 to 200,000 t/year: 6 samples + tests > 200,000 to 300,000 t/year: 8 samples + tests for every additional 100,000 t or part thereof: 2 additional samples + tests	None no (additional) sample + test	
Feed subject to compulsory labelling at site	up to, <b>including</b> 2,000 t/year: 1 > 2,000 to 5,000 t/year: 3 samples + tests > 5,000 to 10.000 t/ year: 5 samples + tests > 10,000 to 50,000 t/year: 10 samples + tests > 50,000 to 100,000 t/year: 15 samples + tests	None no (additional) sample + test	

<sup>&</sup>lt;sup>1</sup> All feed quantities relate exclusively to "VLOG geprüft" feed or feed that is to be labelled as "VLOG geprüft".

<sup>&</sup>lt;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.

> 100,000 to 200,000 t/year: 20 samples + tests	
> 200,000 to 300,000 t/year: 25 <del>samples + tests</del>	
for every additional 100,000 t or part thereof: 5	
additional <del>samples + tests</del>	

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):**

Parts in table deleted

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 <del>x per year</del>
bulk "Ohne Gentechnik" raw materials/products + bulk raw	
materials/products not subject to mandatory labelling but not	6 <del>x per year</del>
"Ohne Gentechnik" compliant	
bulk "Ohne Gentechnik" raw materials/products + raw	12 y nor year
materials/products subject to mandatory labelling	12 <del>x per year</del>

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 B2.

### B 4.2.4 Evaluation of Test Results

added and moved from Annex (5)

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

<sup>&</sup>lt;sup>3</sup> Raw materials/products packed in tamper-proof packaging need not be tested of raw materials/products has no influence on the number of tests

≥ 0.1 % ≤ 0.9	% GMO	
Case-by- case evaluation	Can the GMO contamination be traced back to your own business? (e.g., dual use)	Yes: 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  No: Inform suppliers.
	Are relevant values regularly detected at the respective	Yes: The actions taken (cf. Chapter B 2.4) are not adequate and must be revised.
organisational level (in relation to the number of tests)?	No: (No systemic cause): No action needed.	
> 0.9 % GMC		
Not labellin VLOG produc	g compliant, not permissible for ction	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	
GMOs not verifiable or ≤ limit of detection (generally 0.1% GMO)		
Labelling compliant, permissible for VLOG production	No action needed	
> Limit of detection (generally 0.1% GMO)		
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in 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).

Explanation: If testing is mandatory, the drop shipper may convert feed only if the sampling and testing of the feed-was done according to Chapter B 6.2.

deleted

# **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

added

- 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: <a href="https://www.ohnegentechnik.org/risk-prone">https://www.ohnegentechnik.org/risk-prone</a> 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.

reworded

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.

Parts in table added and deleted

Area List of all products at site	Sampling + testing at "VLOG geprüft" incoming goods	Minimum sampling + testing in "VLOG geprüft" outgoing goods inspection (trade incl. conversion) per calendar year
No bulk feed subject to compulsory labelling at site	For every batch of risk-prone feed material that is to be converted graded as risk-prone: 1 sample + test	up to, <b>including</b> 10,000 t/year: 1 sample + test > 10,000 to 50,000 t/year: 2 samples + tests > 50,000 to 100,000 t/year: 4 samples + tests > 100,000 to 200,000 t/year: 6 samples + tests > 200,000 to 300,000 t/year: 8 samples + tests for every additional 100,000 t or part thereof: 2 additional samples + tests

Area List of all products at site	Sampling + testing at "VLOG geprüft" incoming goods	Minimum sampling + testing in "VLOG geprüft" outgoing goods inspection (trade incl. conversion) per calendar year
Bulk feed subject to compulsory labelling at site	For every batch of risk-prone feed material that is to be converted graded as risk-prone: 1 sample + test	up to, <b>including</b> 2,000 t/year: 1 sample + test > 2,000 to 5,000 t/year: 3 samples + tests > 5,000 to 10,000 t/ year: 5 samples + tests > 10,000 to 50,000 t/year: 10 samples + tests > 50,000 to 100,000 t/year: 15 samples + tests > 100,000 to 200,000 t/year: 20 samples + tests > 200,000 to 300,000 t/year: 25 samples + tests for every additional 100,000 t or part thereof: 5 additional samples + tests
Exclusive drop shipper or shipper who only transports the goods but does not store or tranship them	For every batch of <b>risk-prone</b> feed material graded as risk-prone that is to be converted: 1 sample + test  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

reworded

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**.

added

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.

added

# 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

# Version 23.01

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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.

added

# 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 <a href="https://www.ohnegentechnik.org/SRAE">https://www.ohnegentechnik.org/SRAE</a>.

parts in table added and changed

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements		
(generated as a	<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 <b>Part</b> C.				
All types of feed business, that is used in the "Ohne Gentechnik" production of food and is intended to be advertised/labelled as "VLOG geprüft"*.  For bulk and/or bagged/packaged feed, produced in the business that is used in the "Ohne Gentechnik" production of food and is not intended to be advertised/labelled as "VLOG geprüft".		C1-C3			
Sub-stage Mok	Sub-stage Mobile grinding and mixing facility: Commercial, multi-operation production of feed using mobile equipment in agricultural businesses.				
Grinding/ mixing of feed  For services rendered in "Ohne Gentechnik" production 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 services rendered in "Ohne Gentechnik" production the grinding and/or mixing of feed that is not to be advertised/labelled as "VLOG mixture".  C1-C2, C4  C1-C2, C4					
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).					

Table C 1: Stage definition and mandatory certification

<sup>\* (</sup>Word mark or seal according to chapter A 10)

### **Details of the Certification Procedure**

moved to Z

### **Audit Frequency**

A routine audit is to be carried out each calendar year.

Explanation: If a mobile grinding and mixing facility has a QS certification, the VLOG auditing interval for the grinding and mixing facility can, at the request of the business, be adjusted to match the audit interval under QS controls (max. 2 years).

# Knock Out (KO) criteria

deleted

The following KO requirements have been determined:

- Risk management (C 2.4)
- Handling of non-compliant feed (C 2.8)
- Segregation of the flow of goods/exclusion of commingling (C 2.7)
- ◆ Traceability (C 2.9)
- Crisis management (C 2.12)

# C 2 General Requirements

# C 2.1 Standard Usage Agreement with VLOG

added

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.

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 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, products and/or processes.

deleted

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.

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) for the "VLOG geprüft" area

deleted

- 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.)

added

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.

### Risk management

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

added

reworded and

# C 2.5 Commissioning External Service Providers

he moved from A ed

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:

reworded and added

- 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 Commingling Contaminations (KO)

changed

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 carryover of 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.

changed

# 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)

added

- 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

added



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.
- $oldsymbol{i}$  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)).

added

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))

added

- 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.

reworded

### 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.

added

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.

added

# 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.

### 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 ≤ 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
- Determination of the parameters to be tested (see Guideline for Laboratories)

• Description of the test procedure (commissioned laboratory, scope of testing **cf.** <u>Guideline</u> 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.

### C 3.1.2 Sampling and Commissioning a laboratory

moved from J

moved

added

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.

### 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).

moved from Annex (5)

parts in table added and deleted

Area Production at site	Sampling + testing at "VLOG geprüft" incoming goods (raw materials)	Minimum sampling + testing in "VLOG geprüft" outgoing goods inspection <sup>1</sup> per calendar year
Entire production not subject to compulsory labelling	For every batch of risk-prone feed material graded as risk-prone	up to, <b>including</b> 10,000 t/year: 1 <del>sample + tests</del> > 10,000 to 50,000 t/year: 2 <del>samples + tests</del> > 50,000 to 100,000 t/year: 4 <del>samples + tests</del> > 100,000 to 200,000 t/year: 6 <del>samples + tests</del> > 200,000 to 300,000 t/year: 8 <del>samples + tests</del> for every additional 100,000 t or part thereof: 2 additional <del>samples + tests</del>
Dual production	For every batch of risk-prone feed material graded as risk-prone	up to, including 2,000 t/year: 1 sample + test > 2,000 to 5,000 t/year: 3 samples + tests > 5,000 to 10.000 t/ year: 5 samples + tests > 10,000 to 50,000 t/year: 10 samples + tests > 50,000 to 100,000 t/year: 15 samples + tests > 100,000 to 200,000 t/year: 20 samples + tests > 200,000 to 300,000 t/year: 25 samples + tests for every additional 100,000 t or part thereof: 5 additional samples + tests

Table C 2: Minimum sampling + testing at the Feed Manufacturing Sub-stage per calendar year<sup>2</sup>

### **Handling of positive Test Results**

deleted

Positive feed test results are to be treated according to Annex (5).

The handling of the affected feed in the business must follow the specifications of Chapter C 3.7.

### 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.

added and moved from Annex (5)

<sup>&</sup>lt;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

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

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		
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 production system? (e.g., dual production)	Yes: 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  No: Inform suppliers.		
	Are relevant values regularly detected at the respective organisational level (in relation	Yes: The actions taken (cf. Chapter C 2.4 are not adequate and must be revised.		
	to the number of tests)?	No: (No systemic cause): No action needed.		
> 0.9 % GMOS				
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

#### **Reference Samples** C 3.2

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.

changed



**i** 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: ..."

# Specific Requirements for Transport, Handling, Storage, Trading, Drop Shipping, Conversion of feed material to "VLOG geprüft" and Private Labelling of Feed

deleted

If the business performs activities in the area of transport, storage, handling, trading, drop shipping, conversion of feed material to "VLOG geprüft" and private labelling of feed that are subject to certification, the relevant requirements according to Part B must be followed. The checklist for the Logistics Stage (see Annex (14) must be applied.

# C 4 Specific Requirements for Mobile Grinding and Mixing Facilities

# C 4.1 Specific Measures to Rule out Technically Avoidable Commingling Eliminate Contaminations

changed

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.

reworded

- 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.

added

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.

reworded

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

reworded

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 is must be evident which mixtures are those with feed that is subject to compulsory labelling and which ones are "VLOG mixtures".

added

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.

**1** 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".

added

# **Transportation of Feed or Trading of Feed**

deleted

If the business performs activities in the area of transport, storage, handling, feed trading **or** and private labelling that are subject to certification, the relevant requirements according to Part B must be followed.

# 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 for the Logistics and Feed Manufacturing Stage

changed

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# Part D: Matrix Organisation Logistics and Feed Manufacturing

added

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

changed

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.

reworded

moved and added

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

A matrix is defined as an association of different businesses/sites for the purpose of VLOG 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. Matrix organisation is available for businesses with at least two sites as well as for the joint certification of multiple businesses with their sites.

moved

Matrix organisation in the Logistics and Feed Manufacturing Stage may be requested for the following six sub-stages:

Transport of feed, raw materials and products

- Trade/drop shipping of feed, raw materials and products (incl. conversion of feed to "VLOG geprüft" quality)
- Storage/handling of feed, raw materials and products
- Private Labelling of feed
- Manufacturing/processing of feed
- Mobile grinding and mixing facilities

Several of these sub-stages may be combined in a single matrix organisation.

Matrix members are subject to the corresponding requirements of Stage B and/or C. The specifications of this Chapter apply additionally.

# Specific information about the Certification Procedure

moved to Z

# **Conditions and Requirements for the Certification**

As a condition for the matrix certification there must exist:

- A contract between the matrix organiser and a VLOG recognised certification body and
- A signed Standard Usage Agreement<sup>1</sup> between the matrix organiser and VLOG-including the VLOG ID issued by the VLOG.



- 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 independent single certification according to the VLOG Standard is not permissible for the same activity area.
- "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 D 2.2.1 the matrix organiser has performed the initial 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.
- Only one certification body may be commissioned for the entire matrix certification. It is not permissible to retain multiple certification bodies for one matrix certification.

### **Certification Procedure**

The matrix certification for logistics and feed manufacturing is to occur in the following steps: (see Chapters D 2.2.1 to D 2.2.7).

- Application for certification made to a VLOG-recognised certification body and submission of the matrix description (see Chapter D 3.1) including risk grading of the sites.
- In case of the 33 %-process (see Chapter 2.2.2): initial collection of data by the matrix organiser

<sup>&</sup>lt;sup>1</sup> Known as "Certification Agreement" until 20 June 2017.

- Audit planning by the certification body with the matrix organiser (scope, date/time, duration of audit)
- Audit performance at the matrix organiser and the matrix site according to Chapter A 3.7 by the auditor, incl. evaluation of requirements, review of risk grading
- Audit evaluation/review by the certification body
  - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
  - including confirmation of the approved sites
- Certification of the VLOG matrix for logistics and feed manufacturing

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

### Application for Certification, Submission of the Matrix Description

The matrix organiser applies to the certification body for matrix certification in accordance with the VLOG Standard, and submits the matrix description (see Chapter D 2.2).

The matrix organiser determines the basis on which the VLOG initial certification and the future approval of additional sites will be carried out (see Annex (9)):

33 %-process: Initial data collection at matrix sites by the matrix organiser, together with audits
by the certification body of the matrix organiser, at 100 % of feed manufacturers and 33 % of
logistics sites (see Chapter D 2.2.2)

<del>or</del>

• 100 %-process: Audit of the matrix organiser and all matrix sites by the certification body (see Chapter D 2.2.3)

The selected procedure of initial certification applies to the approval of new sites in a VLOG matrix for Logistics and Feed manufacturing. The certification body then updates the member and site list (see Chapter D 3.1)

Explanation: If the 33 % process is selected, each site must be audited by the matrix organiser prior to being accepted.

Without an 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. If this is not the case, a corresponding number of sites/applicants must be audited by the certification body prior to acceptance to meet this value. 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 without a certification body audit. If three additional sites are added to the matrix in October, one of them would have to be audited by a certification body (33 % out of 12 = 4).

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

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 by demonstrably competent personnel of the matrix organiser, and thereby verifies the information in the site related facility descriptions of the individual sites. 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 for each site to the certification body.

The certification body reviews and evaluates the matrix description and the site-related facility descriptions of all matrix sites and the matrix organiser. 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 from 100 % of feed manufacturers and at least 33 % of logistic sites (resp. mobile grinding and mixing facilities) by comparing them to its own initial audits.

**I**-Explanation: 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 facility and organisation, geographic location, supplier, etc. If the certification body considers it necessary, it may also audit more than 33 % of the sites.

The certification body must compare the results of the initial data collections with its own results and will initiate whatever measures may be required.

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



 $oldsymbol{\mathbb{L}}$ -Explanation: The certification body has the right not to accept the data collected by the matrix organiser and to conduct an audit of all sites. The decision must be justified in a verifiable manner.



Explanation: Annex (9) schematically shows the process of matrix certification.

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

As an alternative to Chapter D 2.2.2, all audits are to be performed by the certification body (see Annex <del>(9)):</del>

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



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

The matrix organiser is to transmit the site-related facility descriptions of the sites to the certification body. The certification body performs VLOG audits in accordance with Chapter A 3.7 the sites. The certification decision is based on the VLOG audit.

### **Effects of Audit Results on Labelling and Marketing**

If, due to the audit results, the certification of the VLOG matrix is suspended or revoked, the labelling of products with "VLOG"/"VLOG geprüft" is not permitted for any members of the **VLOG** matrix.

The matrix may continue to market raw materials and products labelled "VLOG" and feed labelled "VLOG geprüft" even if individual sites were excluded from the matrix. In this case, the marketing of raw materials and products labelled "VLOG"/feed labelled "VLOG geprüft" will be prohibited only for the excluded former sites.

### **Certificate Issuance**

The VLOG certificate will be issued for the VLOG matrix logistics and/or feed manufacturing and must contain the company name of the matrix organiser. The matrix organiser will also receive the list of sites from the certification body.

#### Issuance of Certificates for Matrix Members/Sites

The certification body may issue the facility a certificate stating that it is part of a VLOG matrix organisation. This certificate, which lists the stage of the site, will state that the certificate is only valid as long as the facility is a member of the VLOG matrix and the matrix has a valid certificate.

Explanation: The matrix organiser's permission is not necessary to issue the certificate. However, the competent certification body should inform the matrix organiser of the issuance of the certificate.

### **Distribution of the Audit Report**

For each audit, the matrix organiser and/or the audited site are to receive an audit report from the certification body including any deviations found and measures to be implemented.

Explanation: The audit report of the site is to be distributed to the sites via the matrix organiser or sent to them directly, depending on what was agreed beforehand.

# Follow-up Certification and Monitoring/Audit Intervals

The certification body is responsible for and monitors the compliance with audit dates. This is to be done with the support of the matrix organiser. The matrix organiser is responsible for the implementation of corrective actions at the sites. The certification body is responsible for monitoring the effectiveness of the corrective actions.

Explanation: At the start of the new auditing season, the matrix organiser must coordinate the audits for matrix members/sites planned for the year with the certification body.

In the case of logistics and feed manufacturing matrix organisations, the certification body is to perform an audit of the matrix organiser each calendar year; for the matrix sites, audits at the intervals specified below. The audit interval commences as of the date the certificate is first issued.

### **Audit intervals of different sites:**

- Feed manufacturing/processing sites must be audited each calendar year by the certification body
- All matrix sites of the stages of Logistics, Mobile Grinding and Mixing Facilities must be audited
  by the certification body within 3 years (i.e., in the third following calendar year at the latest).

If a follow-up audit is conducted sooner than necessary (e.g., one calendar year sooner), subsequent regular audits must also be scheduled sooner.

# **Knock Out (KO) criteria**

deleted

The following KO requirements have been determined:

- Contractually binding of the members (D 2.3)
- Risk management (D 2.4)
- Handling of non-compliant feed, raw materials and products (D 2.8)
- Crisis management (D 2.11)

# 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.

moved

# 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.

reworded

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. The certification body decides whether additional audits must be performed outside the regular intervals.

added

deleted

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
- Specifications and duties under the individual risk management of the matrix.
- Implementation of the established corrective actions by the member within the established time periods. The member must sign the agreement (declaration of participation).

deleted and reworded

# 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)

added

- 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.)

added

added

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

reworded and moved from A

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 Implementation of the Requirements for 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.

reworded

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)

reworded

- 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
- Determination of the parameters to be tested (see Guideline for Laboratories)

moved

Description of the testing procedure (commissioned laboratory, scope of testing,-cf. Guideline for Laboratories)

added

The sampling and testing plan is to be implemented according to schedule.

moved

Explanation: If collective samples from various batches/feed deliveries are tested, their results cannot be applied as single-operation test results.

moved

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.

### D 2.6.2 Sampling and Commissioning a laboratory

moved from J and Annex (5)

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.

added

### 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.

added and moved from Annex (5)

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.

### <u>Feed:</u>

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)	Yes: 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).  No: Inform suppliers.		
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	Yes: The actions taken (cf. Chapter D 2.4/C 2.4) are not adequate and must be revised.  No (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	
GMOs not verifiable or ≤ limit of detection (generally 0.1% GMO)		
Labelling compliant, permissible for VLOG production	No action needed	
> Limit of detection (generally 0.1% GMO)		
Not labelling compliant, not permissible for VLOG production	Take further action in accordance with the procedures established in Chapters 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.
- Performs a site evaluation based on the evaluation results.

moved

Defines risk-based measures (e.g. site evaluation) for the matrix sites as applicable.

### **Handling of positive test results**

deleted

In case of positive GMO test results, the matrix organiser must initiate (corrective) measures according to Annex (5) (for feed) and Annex (6) (for food) as well as the provisions of Chapters B 5.2.3 or C 4.2.3.

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.

# D 2.7 Staff and Member Training by the Matrix Organiser

changed

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: Employees of the matrix organiser involved in relevant operating processes for "VLOG"/"VLOG geprüft" include, for example, QM, Procurement etc.

deleted

Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): <a href="https://www.ohnegentechnik.org/staff">https://www.ohnegentechnik.org/staff</a> 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. D 2.11)

added

- 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.

added

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)).

added

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))

added

- 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.

moved

#### 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.

added

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.

added

#### 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

# Version 23.01

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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.

added

# **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: <a href="https://www.ohnegentechnik.org/SRAE">https://www.ohnegentechnik.org/SRAE</a>.

Parts in table changed and added

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
Sub-stage of Animal probefore slaughter.	oduction: The production of primary products of animal ori	igin, including milking and livestock production (includin	ng aquaculture)
Primary production of food of animal origin (e.g. milk, meat, eggs, honey, fish)	For any agricultural business (also members in VLOG group certifications according to Chapter F) that carries out primary production to be labelled as "Ohne Gentechnik" and whose "Ohne Gentechnik" production fulfils the following business sizes:  • Apiary: ≥ 50 beehives  • Egg-producing operations: ≥ 350 animal spaces  • Milk production: annually ≥ 10 cows		E 1 - E 4

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
Rearing, sale and outso	urcing of animals		
Laying hens	For agricultural businesses that sell pullets to the aforementioned primary producers and whose "Ohne Gentechnik" compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:  • Rearing of laying hens: ≥ 700 animal spaces	For agricultural businesses that sell pullets to the aforementioned primary producers and whose "Ohne Gentechnik" compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:  • Rearing of laying hens: < 700 animal spaces  A document check is necessary.*	E1-E4
Piglets	<ul> <li>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:</li> <li>The facility is not registered with VLOG as a piglet rearing facility and</li> <li>business fulfils the following business size:     ≥ 250 animal spaces for piglets under 30 kg</li> </ul>	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:  • < 250 animal spaces for piglets under 30 kg  A document check is necessary.*	E1-E4
		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:  • The facility is not registered with VLOG as a piglet rearing facility	E1-E4
		Please contact the VLOG head office for information regarding registration.	

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
		Proof in accordance with Annex (2) is required (cf. Chapter E 4.8)	
Cattle and other ruminants for dairy and meat production	For agricultural businesses that sell gestating cows (dry cows) ¹ 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:  • ≥ 20 animal spaces in ruminant rearing/maintenance of gestating cows	For agricultural businesses that sell gestating cows (dry cows) 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:  • < 20 animal spaces in ruminant rearing/maintenance of gestating cows  A document check is necessary.*	E1-E4
		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> Proof in accordance with Annex (2) is required (cf. Chapter E 4.8)	E1-E4

<sup>&</sup>lt;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>&</sup>lt;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.

	Certification required according to VLOG Standard	Approval by document check, registration and/or proof, Annex (2)	Standard requirements
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.	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.	E 1 - E 4

<sup>\*</sup> 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.

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Sub-stage of Plant-bas	ed production: The cultivation of primary products, includir	ng harvesting and foraging.	
Cultivation of feed	For the cultivation of feed used within the operation for the production of food of animal origin with the "Ohne Gentechnik" label.  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.  E 1 - E 5  For the cultivation of feed not used within the operation of feed not used within the operation of feed not used within the operation for the production of food of animal origin with the "Ohne Gentechnik" label.  In EU countries in which the cultivation and the release of genetically modified plants for research purposes is prohibited by law.		E1-E5
Cultivation of raw materials (food)		For the production of plant-based raw materials (food).	

Sub-stage of Animal transport/livestock trade: 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 E1-E6 For commercial animal transport of VLOG animals, For commercial animal transport, provided that all of E1-E6 provided that least one of the following three the following three conditions are met: requirements is fulfilled: • Commissioning by a VLOG certified business. • No commissioning by a VLOG certified business. • Transport is integrated into the risk management • Transport is not integrated into the risk of the VLOG certified business. management of the VLOG certified business. • An agreement is in effect between the carrier • There is no agreement in effect between the carrier and the certified business regarding compliance and the certified business regarding compliance with the requirements of the VLOG Standard. with the requirements of the VLOG Standard. E1-E6 Trade and **commercial** transport of animals which have not yet begun the minimum feeding conversion period.

Table E 1: Stage Definition and Mandatory Certification

# E 2 Criteria for Risk Grading in the Area of Animal Production

changed

Explanation: Guidance on how to grade agricultural businesses into the correct risk categories is available on the VLOG website: <a href="https://www.ohnegentechnik.org/risk\_grading\_agriculture">https://www.ohnegentechnik.org/risk\_grading\_agriculture</a>.

#### 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.

<u>Grading a business with various areas of application</u> (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:

reworded

A business may only be graded into multiple risk categories if all of the following requirements are met:

deleted

- the business is a member of a VLOG group certification for one area of application,
  - 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)

parts in table added

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<ul> <li>Only possible if all of the following criteria are met:</li> <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>	Feed subject to compulsory labelling, which can be swapped, is present at the site.  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.	Following initial conversion to VLOG production ( <b>possibly time-lagged</b> ), 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> .
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn  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.	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).		
Certification status of risk-prone feed in VLOG	Risk-prone feed and the feed supplier (excluding cf. Chapters B 1, C 1) must be certified pursuant to the VLOG Standard		Risk-prone feed that has not been certified pursuant to the VLOG

 $<sup>^{3}</sup>$  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
production (cf. Chapter E 4.2)	or a standard recognised as equivalent. This also applies to oils used for dust binding in grinding and mixing facilities.		Standard or a standard recognised as equivalent is used.  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).
Use of grinding and/or mixing facilities	Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard.  Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.	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.  Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:  The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio <sup>4</sup> ).  Measures to prevent contaminations with GMO are	Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard.  Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.  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).

<sup>&</sup>lt;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
		described in the QM manual of the facility operator.	
Livestock transport/livestock trade	The animals are not fed in the business, during transport, trans-shipment and rest periods.		

Table E 2: Criteria for Risk grading

# **Conditions and Requirements for a Document Audit**

moved to Z

A document audit can only be performed as part of an expansion certification in agriculture (see Chapter A 3.2) if all of the following requirements are met:

Criterion	Requirement
Change of risk category	The risk category of all VLOG areas of application remains the same or is diminished. Alternatively, the risk category can be graded separately for the individual areas of application under certain conditions (see Chapter E 2.1).
Site/ operating units of the new area of application were audited on site of the new area of application were audited on site of the new area of application were audited on site of the previous vlog-group/or routine audit.	
Additional criteria for	r facilities that have hitherto been organised into a VLOG group or certified:
Previous on site audit by the certification body	The group member was already audited on site by a VLOG recognised certification body.
Data approval by the previous group organiser	The group organiser agrees in writing to the use of the audit documents (current audit data) for the expansion certification in agriculture.

Table 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 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 (see Chapter A 3.1).

# **Audit Frequency**

moved to Z

The following audit intervals are mandatory depending on the type of certification or combination of certifications:

#### **Individual certification:**

Each calendar year, one routine audit is carried out for individual certification of agricultural businesses.

If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit, provided the following conditions are met:

The animals are transported directly from the supplier to the buyer (e.g. slaughterhouse)
 without interim stabling and feeding

<del>or</del>

 Only animals with individual IDs may be unloaded or reloaded between the starting point and the transport destination (e.g. at a collection point) and the cattle trader/carrier does not feed VLOG animals.

#### **Agricultural group certification:**

If the agricultural business is a member of a group certification in agriculture, the audit must be performed in accordance with Chapter F 2.4.

Combination of individual certification and group certification in agriculture or combination of multiple group certifications with various areas of application per business:

If an agricultural business is certified as part of a VLOG group for one area of application and is individually certified for another area of application, the audit interval is based on the risk grading of the business under Chapter F 2.4. Under certain conditions, different areas of application can be graded into different risk categories, thereby enabling different audit intervals (see Chapter E 2.1).

# Knock Out (KO) criteria

deleted

The following KO requirements have been determined:

- Handling of non-compliant feed, products and animals (E 3.5)
- ◆ Traceability (E 3.6)
- Crisis management (E 3.8)
- Incoming goods inspection (E 4.6, E 5.1, E 6.1)
- Compliance with the minimum feeding conversion period (E 4.7)
- Segregation of goods flows/exclusion of carryover from GMO feed, commingling and swapping (E 4.8, E 5.2, E 6.3)

# 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.

added

# E 3.2 Facility Description

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

changed

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

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.

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.

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

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.

#### 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
- Carryover and commingling Contamination by third parties

- or
- Carryover and commingling 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

added

changed

#### 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

<sup>&</sup>lt;sup>5</sup> For definition see Glossary

- 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

reworded and moved from A

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)

added

- 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.

added

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 <a href="http://www.ohnegentechnik.org/qgsc">http://www.ohnegentechnik.org/qgsc</a> 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.
- $oldsymbol{i}$  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)).

added

#### **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))

added

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.

added

# 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): <a href="https://www.ohnegentechnik.org/staff">https://www.ohnegentechnik.org/staff</a> 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.

added

# 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

text and footnote transferred to table

these species or was made from them shall be classified as risk-prone or not risk-prone in accordance with the following criteria.

parts in table changed

Risk-prone	Not risk-prone		
Thore profile			
	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.		
Soy, rapeseed/canola,	Soy, rapeseed/canola, cotton		
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		
Maize/corn			
Feed material from maize/corn and compound feed that contains maize/corn or was made from it.	Feed material 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.		
	Dried maize/corn kernels if the following two conditions are met:		
	<ul> <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.</li> <li>A written confirmation is available.</li> </ul>		
	<b>Maize/corn silage or silage maize/corn</b> if the following two conditions are met:		
	<ul> <li>Verified cultivation of the maize/corn in the aforementioned countries</li> <li>Purchased utilising one of the following three options:</li> </ul>		
	<ul> <li>drop shipper with transport directly from the producer to the customer without intermediate storage</li> </ul>		
	– Trader:		
	<ul> <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>		
	A batch-specific certificate of origin/declaration by the drop shipper, trader or producer must be on file.		

Sugar Beets		
Feed material from sugar beets and compound feed that contains sugar beets or was made from them.	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.	

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 and without other accompanying documents.

moved deleted

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

Explanation: The agreement must comprise at least the names and addresses of the businesses involved and the name of the feed(s) included in the agreement.

deleted

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 in purchased by the business, their origin as well as their intended use (animal species/animal category) are indicated.

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

**I**-Explanation: The feed list serves as an aid for ensuring "Ohne Gentechnik" feeding:

deleted

- The list may serve as a basis to verify and ensure that appropriate certificates are at hand for every delivery of feed, certifying that this feed is not subject to compulsory labelling.
- Identification of overlaps in the purpose of feed for different animal species. This is decisive
  especially when feeding with feed not subject to compulsory labelling occurs at the agricultural
  business simultaneously with feed that is subject to compulsory labelling. These are to be
  labelled "interchangeable".

The feed list must initially be drawn up within the scope of a first assessment. After that it must be kept up to date by adding new feeds and new suppliers, and by deleting those that no longer exist. However, the latter may only be done once the respective feed has been fully consumed and is no longer present on the premises. Additions and deletions must be noted with the date of the first purchase or the date of the last consumption.

#### E 4.5 Feed Rations

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

changed

# 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: <a href="https://www.ohnegentechnik.org/SRAE">https://www.ohnegentechnik.org/SRAE</a>.

#### **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.

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<sup>&</sup>lt;sup>6</sup> See Glossary

# 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.

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 (see EGGenTDurchfG, most recently amended by Art. 58 V of 31 August 2015 | 1474)

deleted

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:

parts in table added

	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> <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>

<sup>&</sup>lt;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.

	Rearing facility/previous owner is <u>not</u> VLOG-certified	<ul> <li>The rearing facility/previous owner under E 1 is not subject to certification obligation and</li> <li>There is written confirmation from the rearing facility/previous owner in accordance with Annex (2)</li> </ul>
		Only relevant for piglet rearing facilities:
		The rearing business is registered with VLOG and
		Registration of the rearing business must be checked regularly, at least once per calendar year (registration certificate) and
		There is a written confirmation from the previous owner in accordance with Annex (2)
"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	The complete minimum conversion feeding period will be ensured at the buyer's VLOG facility

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 functionality of the procedure must be verifiable by third parties.

deleted

- 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 Carryover from GMO Feed, Commingling and Swapping (KO)

changed

#### **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.

Explanation: If in addition to "Ohne Gentechnik" feeding other animals are fed in an agricultural business with feed that must be labelled or which is grown in the vicinity of genetically modified crops, there is a strongly increased risk of carryover through residual feed, shared use of equipment, dust, etc.

deleted

#### Feed of different qualities:

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

 The agricultural business does not carry out any conventional production of the same animal category with feed subject to compulsory labelling parallel to "Ohne Gentechnik" production.

moved

- Permissible exception: The different productions take place in completely different operating facilities, which also involves completely separate storage and handling of feed.
- 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

reworded

- 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 <del>dry</del> cleaned after having transported bulk feed subject to compulsory labelling.
  - Additionally, in the case of temporal segregation:

reworded

 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)

If interchangeable feed subject to compulsory labelling is available, the following additional requirements must be complied with:

deleted

- 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:

added

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

moved and reworded

- 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:
  - If the business simultaneously handles "Ohne Gentechnik"/"VLOG" products it produces itself and products not suitable for the "Ohne Gentechnik" system, it must be ensured by appropriate measures that no commingling or swapping of food of the different qualities occurs. 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.
  - Furthermore 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 from receiving the feed through animal production to delivery/transport of the animal products/animals.

# 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.

moved

# 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.

reworded

- the operator of the mobile grinding and mixing facility must have written permission from each VLOG certified agricultural business or agricultural VLOG group member. This authorises the operator of the mobile grinding and mixing facility to sample the manufactured "VLOG mixture".
- The VLOG certification of the grinding and mixing facility is checked regularly, but at least once per calendar year.

moved

#### 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:

reworded

 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):
    - The measure can be substantiated by a facility report/attestation by the facility manufacturer, for example. Regardless of the operator's risk assessment, a system purge must be performed whenever the previous mixture was composed of more than 40% feed subject to compulsory labelling (relative to total mixture weight).
    - 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

### Specific Measures to Eliminate Carryover of GMO Feed

moved

The business must define measures in the facility description (cf. E 3.1) in accordance with Chapter E 3.3 to prevent the carryover of GMO feed through the use of mobile grinding and mixing facilities. These measures are to be implemented, documented and checked for effectiveness within the scope of self-monitoring. If system purges from the mobile grinding and mixing facility remain, it is to be ensured that they are not used for "Ohne Gentechnik" production.

### E 4.10.2.2 Documentation of Feed Mixture Grinding and Mixing Protocol

changed

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 of Grinding and Mixing Facilities Exclusively for Feed Not Subject to Compulsory Labelling

changed

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

-Explanation: If a grinding and mixing facility is used exclusively for feed not subject to compulsory labelling/"VLOG geprüft" feed, there are no further requirements.

deleted

# E 4.10.3.2 Dual Use of Grinding and Mixing Facilities for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling

changed

If the grinding and mixing facility is used for both feed not subject to compulsory labelling/"VLOG geprüft" feed and feed subject to compulsory labelling, the conditions specified in the following chapters must be met.

deleted

#### Specific Measures to Eliminate Carryover of GMO Feed

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

reworded

- 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.
- The system purge must be carried out in accordance with the manufacturer's instructions and in a sufficiently large quantity. The batch size must have a transparent basis (e.g. manufacturer's specifications regarding carryover or own test results).
- System purges are to be used outside of the "Ohne Gentechnik" production.
- The manner in which complete discharge or system purges are performed has to be clearly documented.
- 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.

moved

#### **Documentation of Feed Mixture**

moved

The sequence of the mixtures and the individual mixtures are documented daily for each facility.

The documentation must clearly distinguish between mixtures containing feed that is subject to compulsory labelling and "VLOG mixtures".

Each completed "VLOG mixture" must be documented with a mixing protocol according to Annex (30) or an equivalent mixing protocol. This document is to be countersigned by the person preparing the mixture.

# 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.

moved and reworded

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**)

added

The sampling and testing plan is to be implemented according to schedule.

moved

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

added

The VLOG homepage offers an assessment aid on the suitability of feed for testing: <a href="https://www.ohnegentechnik.org/gmo\_testing\_suitability">https://www.ohnegentechnik.org/gmo\_testing\_suitability</a>.

# E 4.11.2 Sampling and Testing Frequency, Retention of Reference Samples

changed

#### Sampling frequency:

Sampling must take place in the following cases:

At every delivery of risk-prone feed material and compound feed<sup>8</sup> (cf. Chapter E 4.2)

foot deleted

• When using a stationary or mobile grinding and mixing facility in accordance with the guidelines in Table E 6.

added changed

• After <u>each</u> 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 before or at the beginning 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:

moved from J

Feed: min. 400 g, max. 1 kg

<sup>&</sup>lt;sup>8</sup>-This also applies to the additional purchase of feed from grinding and mixing facility operators

• 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>9</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

moved from J

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: <u>Annex 3 of the Guideline for Laboratories</u> 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).

moved from Annex (5)

#### 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

<sup>&</sup>lt;sup>9</sup> Delivery of risk-prone feed; switch between "ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling

and also

 after <u>every</u> 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.

Explanation: VLOG operating units/VLOG stables are exempt from feed change tests where a documented wet cleaning of the stable and feed infrastructure (incl. silos) is performed before "ohne Gentechnik" feeding.

deleted

#### 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>10</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		Sampling + testing not required
Facility also processes feed subject to compulsory labelling	Sampling + testing not required	1 test result per audit interval	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.

added and moved from Annex (5)

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<sup>&</sup>lt;sup>10</sup> Or in accordance with a recognised VLOG-equivalent standard

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	
GMO not verifiable or < 0.1%			
Labelling compliant, permissible for VLOG-production		No action needed	
≥ 0.1 % to ≤ 0.9 % GMO			
case evaluation (6)	Can the GMO contamination be traced back to your production system? (e.g. dual production or change of feed)	Yes: 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.  No: Inform suppliers.	
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	Yes: The actions taken (cf. Chapter E 3.4) are not adequate and must be revised.  No: (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 commingling and carryover contaminations must be documented in writing.

changed

• 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.

moved

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.

reworded



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

If new businesses/sites join the group and also wish to take advantage of the reduced scope of testing, at least one test result of feed switching must be submitted for each new site.

moved

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.

# 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.

added

# 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 to be used within the business is GMO free for internal farming purposes are exempt from labelling under Directive 98/95/EC.

changed

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

moved

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

Explanation: The GMO-free nature of the seeds and plant material is achieved, for example, by the absence of a label in accordance with Directive 98/95/EC on seed documents/declarations.

moved

# E 5.2 Segregation of Goods Flows/Exclusion of Commingling and Swapping Contamination (KO)

changed

GMO carryover 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.

changed

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. In the case of livestock traders/animal carriers, the requirements of Chapter E 4 and this chapter are checked in addition to the general requirements of the Agriculture Stage.

changed

# E 6.1 Animal Transport Overview

added

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).

# **Risk Management**

Besides Chapter E 3.3, the risk management including the risk analysis must consider the following points:

moved and deleted

- Separate handling of VLOG animals and non-VLOG animals
- If applicable: handling of feed subject to compulsory labelling and feed that is not
- Other business-specific items as necessary

Explanation: In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with "Ohne Gentechnik" it is only permissible to use feed not subject to compulsory labelling.

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

The risk-targeted process steps for ensuring the Standard requirements are to be documented for each operation with a separate proof of adequate spatial, temporal or logistical measures and their efficacy reviewed as part of the self-monitoring process.

deleted

## 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.
- Animals with farm identification (e.g., pig ear tags specifying the agricultural operation's VVVO number):

deleted

 If only animals that are verifiably VLOG animals are accepted with a transport from an operation, the operation identification of the animals serves as sufficient verification of segregation.

If both VLOG animals as well as animals of other qualities are accepted with a transport from an operation, the different groups must be verifiably segregated during transport/conveyance. The segregation measures must be documented in the transport documents.

Explanation: The unique individual animal identification serves as sufficient verification of segregation.

# E 6.3.2 Feeding of Animals

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

added

- 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

# Version 23.01

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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.

reworded and added

# 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 and the agricultural group members.

deleted

parts in table added and changed

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements		
purpose of	<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.				
Agricultural group organiser, hereinafter group organiser: 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			In a VLOG group		
	For primary production of food of animal origin	For the production of plant-based raw materials (food).	F 1-F 2		
<ul> <li>Agricultural group member, hereinafter group member: Agricultural operation/site which is contractually integrated into a VLOG agricultural group.</li> <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 Certification

# **Specific information about the Certification Procedure**

moved to Z

# **Conditions and Requirements for the Certification**

As a condition for group certification the must exist:

- A contract between the group organiser and a VLOG recognised certification body and
- A signed Standard Usage Agreement between the group organiser and VLOG<sup>±</sup> including the VLOG-ID issued by VLOG

# Certification Procedure

Group certification in agriculture is to be performed in accordance with the following steps: (see Chapters F 2.2.1 to F 2.2.7)

- Application for certification made to a VLOG recognised certification body and submission of the group description (see Chapter F 3.1) including risk grading of the agricultural businesses.
- 25 %-process (see Chapter F 2.2.2): initial collection of group member data by the group organiser
- Audit planning by the certification body with the group organiser (scope, date/time, duration of audit)
- Auditing of the retail group organiser and the retail group members in accordance with Chapter
   A 3.7 by the auditor including evaluation of the requirements, verification of risk grading
- Audit evaluation/review by the certification body
  - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
  - including confirmation of the approved retail group members
- Certification of the VLOG agricultural group

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

# Application for Certification, Submission of Group Description

The group organiser applies to the certification body for group certification in accordance with the VLOG Standard, and submits the group description (see Chapter F 2.2).

The group organiser must determine the basis on which the VLOG initial certification and the future approval of additional group members will be carried out (see Annex (8)):

• 25 % process: Initial collection of group member data by the group organiser, together with audits by the certification body at the group organiser and at 25 % of the group members (see Chapter F 2.2.2)

or

 100 % process: Audit of the group organiser and all group members by the certification body (see Chapter F 2.2.3).

<sup>&</sup>lt;sup>1</sup> Known as "Certification Agreement" until 20 June 2017.

The chosen initial certification procedure is to be used for approval of new group members of a VLOG agricultural group. The certification body will subsequently update the list of members (see F 2.2.7).

 $oldsymbol{1}$ -Explanation: If 25 %-process is selected, each facility must be audited by the group organiser prior to

Without an audit by the certification body, a 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).

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

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

The group organiser performs the initial collection of data from all group members, i.e. on-site selfmonitoring using the VLOG checklists (Annex (22)) by demonstrably competent personnel of the group organiser, and 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 E 2.1. The group organiser subsequently forwards all facility descriptions, also indicating the corresponding risk categories, and checklists for each group member to the certification body.

The certification body reviews and evaluates the group description and the facility descriptions of all group members and the group organiser. 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.

The certification body must compare the results of the initial data collections by the group organiser with its own results and will initiate whatever measures may be required. The certification body has the right not to accept the data collected by the group organiser and to conduct an audit of all group members. Such a decision must be properly substantiated in detail.

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 for the coming audit period on this grading.

The initial certification of the VLOG group will be based on the initial data collections and the audits by the certification body of the group organiser and the group members; if necessary, with follow-up audits.



Explanation: See Annex (8) for a schematic representation of the group certification procedure.

The audit of the group organiser is generally done before the audits of the group members.

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. If the certification body considers it necessary, it may also audit more than 25 % of the group members.

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

As an alternative to E 2.2.2, all audits are to be performed by the certification body (see Annex (8)):

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

The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body then performs VLOG audits in accordance with Chapter A 3.7 at the group members. Risk grading and the certification decision are to be reviewed based on the VLOG audit.



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

# **Effects of Audit Results on Labelling and Marketing**

- -If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with "VLOG" or the "Ohne GenTechnik" seal is not permitted for any members of the VLOG group.
- The continued marketing of "VLOG" or with "Ohne GenTechnik" seal labelled food by the group is permitted if individual group members are excluded from the group. In this case, only the excluded former group members are prohibited from marketing food labelled as "VLOG" or with the "Ohne GenTechnik" seal.

### Certificate Issuance

The VLOG certificate will be issued for the VLOG agricultural group and must contain the business name of the group organiser.

Group members do not receive individual VLOG certificates.

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 F 2.2.1, 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.

# **Issuance of Certificates for Group Members**

If a group member delivers "VLOG" products or animals to another customer aside from the group organiser, the certification body may issue a certificate stating that the facility belongs to a VLOG group certification. The certificate states that it is only valid as long as the facility is a member of the VLOG group and the group has a valid certificate.

Explanation: The group organiser's permission is not necessary to issue the certificate. However, the competent certification body should inform the group organiser of the issuance of the certificate.

# **Distribution of the Audit Report**

For each audit, the group organiser and/or the audited group member are to receive an audit report from the certification body including any deviations found and measures to be implemented.

Explanation: The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

# **Commissioning of Multiple Certification Bodies**

If the group organiser commissions more than one certification body with auditing the group members:

- 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)
- the groups must be organised such that each certification body independently audits the 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 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 required.
- the group organiser ensures that all activities necessary for certification are performed.

# Follow-up Certification and Monitoring/Audit Intervals

The certification body is responsible for, and monitors compliance with, audit dates. This is to be done with the support of the group organiser. The group organiser is responsible for the implementation of the corrective actions by the group members. The certification body is responsible for monitoring the effectiveness of the corrective actions.

Explanation: At the start of the new auditing season, the group organiser must coordinate the group members' planned audits for the year with the certification body.

In the case of agricultural group certifications, the certification body is to perform an audit of the group organiser each calendar year; for the group members, audits at the intervals specified for the corresponding risk category. The audit interval commences as of the date the certificate is first issued.

The following audit intervals apply for the respective risk categories:

- All group members in Risk Category 0 must be audited by the certification body within 3 years
  (i.e. at the latest in the third following calendar year of the last audit)
- All group members in Risk Category 1 must be audited by the certification body within 2 years (i.e. at the latest in the second following calendar year of the last audit)
- All group members in Risk Category 2 must be audited once per calendar year by the certification body.

	Year of Initial Certification	1st Following Year	2nd Following Year	3rd Following Year	4th Following Year	5th Following Year	6th Following Year
Example	2019	2020	2021	2022	2023	2024	2025
Risk Category 0	Initial Audit*	-	-	Audit**	-	-	Audit**
Risk Category 1	Initial Audit*	-	Audit**	-	Audit**	-	Audit**
Risk Category 2	Initial Audit*	Audit**	Audit**	Audit**	Audit**	Audit**	Audit**

Figure 1: Audit intervals of agricultural businesses applicable to group certifications

If a follow-up audit is conducted sooner than necessary (e.g., one calendar year sooner), subsequent regular audits must also be scheduled sooner.

# **Knock Out (KO) criteria**

deleted

The following KO requirements have been determined:

- Contractually binding of the group members (F 3.2)
- Risk management (F 3.3)
- Handling of non-compliant feed, products and animals (F 3.7)
- Crisis management (F 3.9)

# 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.

moved

# F 2.2 Group Description, Members List, Stable Space Overview and Facility Description

 ${\sf added}$ 

# 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

<sup>\* 25 %</sup> process: Auditing by group organiser and of at least 25 % of group members by the certification body. 100 % process: Auditing 100 % of the group by the certification body.

<sup>\*\*</sup>Audit by Certification Body

- 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)

moved

# 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.

reworded

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>2</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.

# 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))

added

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. The certification body decides whether additional audits must be performed outside the regular intervals.

added

deleted

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.

<sup>&</sup>lt;sup>2</sup> Or a compatible format coordinated with VLOG

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

reworded

 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.)

added

added

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

reworded and moved from A

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 Implementation of the Requirements for Sampling and Testing

changed

# 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.

reworded

The sampling and testing plan, in compliance with the requirements listed in Chapter 0, 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
- Determination of the parameters to be tested (see Guideline for Laboratories)

moved

 Description of the testing procedure (commissioned laboratory, scope of testing cf. Guideline for Laboratories).

added

The sampling and testing plan is to be implemented according to schedule.

moved moved

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: <a href="https://www.ohnegentechnik.org/gmo">https://www.ohnegentechnik.org/gmo</a> 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:

moved from J and Annex (5)

- 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

added

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.

added and moved from Annex (5)

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			
GMO not v	GMO not verifiable or < 0.1%				
Labelling compliant, permissible for VLOG-production		No action needed			
≥ 0.1 % ≤ 0.	9 % GMO				
Case-by- case evaluatio n	Can the GMO contamination be traced back to your own production system? (e.g., dual production or change of feed)	Yes: 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)  No: Inform suppliers.			
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	Yes: The actions taken (cf. Chapter F 2.4/E 3.4) are not adequate and must be revised.  No: (No systemic cause): No action needed.			
> 0.9 % GM	> 0.9 % GMO				
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.

added

• Perform a supplier evaluation based on the evaluation results

moved

defines risk-based measures (e.g. supplier evaluation) for the group members as applicable.

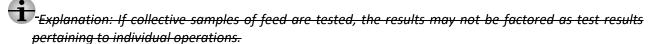
# F 2.6.6 Disclosure of test results to VLOG

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.

# Handling of positive test results

deleted

In the event of positive GMO test results, the group organiser must derive (corrective) action in accordance with Annex (5) and Chapter F 3.7.



Sampling and GMO testing is not required if the utilised risk-prone feed cannot be tested for genetic engineering for technical reasons.

# F 2.7 Training of Staff and Group Members by the Group Organiser

changed

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: Staff members of the group organiser involved in the operating processes of relevance to "VLOG" certification include, e.g. QM, Procurement etc.

deleted

Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): <a href="https://www.ohnegentechnik.org/staff">https://www.ohnegentechnik.org/staff</a> 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)

added

- 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

added



i 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)).

added

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 (see Annex (34))

added

- the VLOG Head Office using the VLOG Incident Sheet (see 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.

moved

### **Documentation and Retention Periods** F 2.12

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.

added

# 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

# Version 23.01

Published on 1 September 2022 Obligatory as of 1 January 2023



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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.

added

# **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: <a href="https://www.ohnegentechnik.org/SRAE">https://www.ohnegentechnik.org/SRAE</a>.

parts in table changed

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<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. <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).			
Food of animal origin/ingredients	For processing/preparing/packaging products of animal origin up to the Packaging Stage in end consumer packaging whenever products of animal origin are to be labelled as "VLOG" or with the "Ohne GenTechnik" seal.  For the retail trade, whenever preparation occurs in outlets, and bulk goods of animal origin are to be labelled with the "Ohne GenTechnik" seal (Part H: Retail - Sale of bulk food of animal origin).	No relevant areas	G 1, G 2, G 4
Plant-based food/ingredients	For plant-based products which are to be labelled as "VLOG" or with the "Ohne GenTechnik" seal up to the Packaging Stage in end consumer packaging.	For plant-based products which are not to be labelled as "VLOG" or with the "Ohne GenTechnik" seal.	G 1 - G 4

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	For risk-prone plant-based products which are to be labelled as "VLOG" or with the "Ohne GenTechnik" seal and which are produced with plant-based ingredients for which there is a plausible risk of carryover/appearance of unapproved GMO variants (cf. Chapter G 4)		G1-G4
Transport, Storage and Trans-shipment as a service and Food Retailing are at the Logistics stage (cf. Part B).			

Table G 1: Stage Definition and Mandatory Certification

# **Details of the Certification Procedure**

moved to Z

# **Risk Grading**

# Risk Category 0 (There is no or only very low risk)

 As a matter of principle, businesses that process or store swappable GMOs on their premises cannot be graded as Risk Category 0.

### Risk Category 1 (There is moderate risk)

 Businesses and process steps with 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 is high risk)

- Businesses and process steps 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
- Test results from the audit period under consideration have indicated that the threshold value of 0.1% GMO per ingredient was exceeded; this resulted from the business' failing to take measures to avoid carryover.

# **Audit Frequency**

A routine audit is to be carried out each calendar year.

# **Knock Out (KO) Requirements**

deleted

The following KO requirements have been determined:

- Risk management (G 2.4)
- Incoming goods inspection (G 2.6)
- Segregation of goods flows/exclusion of commingling and swapping (G 2.7)
- Handling of non-compliant raw materials/products (G 2.8)
- Inspection of outgoing goods/labelling on bills of lading (G 2.9)
- ◆ Traceability (G 2.10)
- Crisis management (G 2.13)

# G 2 General Requirements

# G 2.1 Standard Usage Agreement with VLOG

added

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 (5, 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

added

# **Risk management**

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

added

# 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:

reworded and moved from A

- 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>.

<sup>&</sup>lt;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.

- 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)).

added

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.

# <u>Incoming goods inspection of VLOG-certified raw materials/products of non-animal origin:</u>

- 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 non-VLOG-certified raw materials/products of non-animal origin, in addition to the supplier certification, a note and/or clear contractual provision may be included in the bill of lading.

deleted

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 Commingling and Swapping Contamination (KO)

changed

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.

# 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

added

- 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.

added

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 abovementioned 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."

For advertisement and placement on the German market, only the use of the words "Ohne Gentechnik" is permitted.

deleted

# 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.
- $oldsymbol{\hat{I}}$  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)).

added

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))

added

- 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): <a href="https://www.ohnegentechnik.org/staff">https://www.ohnegentechnik.org/staff</a> 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
- Determination of the parameters to be tested (see Guideline for Laboratories)

• Description of the test procedure (commissioned laboratory, scope of testing **cf. Guideline for Laboratories**)

moved added

The sampling and testing plan is to be implemented according to schedule.

moved

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.

reworded

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
- Commingling and/or carryover Contamination during transport, storage and processing

changed

 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: <a href="https://www.ohnegentechnik.org/gmo testing suitability">https://www.ohnegentechnik.org/gmo testing suitability</a>.

# **G** 3.1.2 Sampling and Commissioning a Laboratory

moved from J and added

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

- Raw materials (whole maize/corn kernels, soy beans or rapeseed/canola grains, among other): at least 3000 grains or approx. the respectively corresponding sample amount (maize/corn at least 1000 g; soy at least 700 g, rapeseed/canola at least 60 g)
- Honey at least 150 g
- Explanation: The minimum quantities referred to relate to entire grains and/or beans. For raw materials that exhibit better homogeneity (e.g. soya protein concentrate), smaller weighed portions may be used in coordination with the responsible laboratory and the client.
  - The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

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

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

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

GMO testing order according to VLOG requirements

# • Composition of the sample:

 If containing soy, maize/corn, rapeseed/canola and/or rice ingredients, it must be indicated in what form these are contained. Copies of the composition/declarations are to be sent to the laboratory along with the samples.

Explanation: <u>Annex 3 of the Guideline for Laboratories</u> 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.

added

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.

Parts in table deleted

Risk category	Annual Minimum number of samples + tests of "Ohne Gentechnik" incoming goods per calendar year <sup>2</sup>
0	2 <del>samples + tests</del>
1	6 <del>samples + tests</del>
2	12 <del>samples + tests</del>

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

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.

added and moved from Annex (6)

<sup>&</sup>lt;sup>2</sup> The number of samples relates to the total quantity of raw materials used in VLOG-production.

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

Table G 3: Evaluation of Test Results

# **Sampling and Handling of Positive Test Results**

deleted

Positive test results are to be treated according to Annex (6).

The affected raw materials and products present in the business are to be handled as outlined in Chapter G 2.8.

# 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

# Specific Requirements for Transport, Storage, Handling and/or Trading

deleted

If the business performs activities in the area of transport, storage, handling, trading and/or drop shipping of food that are subject to the certification obligation, the relevant requirements according to Part B must be followed. The checklist for the Logistics Stage (see Annex 14)) must be applied.



# "Ohne Gentechnik" Production and Certification Standard

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

changed

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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.

reworded and added

# H 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.

deleted

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements		
Retail: Handlir	ng and/or preparing/processing of food and its storage at the	ne point of sale and delivery to the final consumer.			
VLOG retail gr certification in	•	tions (the so-called retail group members) for the purpose of VLC	OG group		
group membe	<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.				
Retail group n	Retail group member, hereinafter group member: 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

### **Details of the Certification Procedure**

moved to Z

### Conditions and Requirements for Retail Group Certification

Contract between the group organiser and a VLOG recognised certification body

Signed Standard Usage Agreement between the group organiser and VLOG<sup>1</sup>

Explanation: The VLOG group sells a very high portion of its bulk "VLOG" food (at least 90 % of the products) to end consumers. If this is not the case, the VLOG requirements for food processing/preparation (see Part G) must also be taken into account within the business and in the VLOG certification.

#### Certification Process

Group certification is to be performed in accordance with the following steps.

Application for certification made to a VLOG recognised certification body and submission of the group description (see Chapter H 1.1H 2.2.1)

Audit planning by the certification body with the group organiser according to Chapter A 3.6. (scope, date/time, duration of audit)

Auditing of the retail group organiser and the retail group members in accordance with Chapter A 3.7 by the auditor, including evaluation of the requirements in accordance with Chapter A 3.9

Audit evaluation/review by the certification body in accordance with Chapter A 3.9.2

- including confirmation/correction of the audit result
- including confirmation of the approved retail group members

certification of the VLOG retail group in accordance with Chapters H 1 to H 2.2.4.

#### Follow-up Certification and Monitoring/Audit Intervals

The certification body is responsible for, and monitors compliance with, the audit dates. This is to be done with the support of the group organiser. The 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.

Explanation: At the start of the new auditing season, the group organiser must coordinate group member's planned tests for the year with the certification body.

#### **Initial certification**

Each calendar year, the certification body is to perform an audit of the group organiser and audits group members according to the following random sampling scheme:

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 (see Chapter H 2.12). These audits are announced.

·

Page 4

<sup>&</sup>lt;sup>1</sup> Known as "Certification Agreement" until 20 June 2017.

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 (see Chapter H 2.12). These audits are unannounced.

100 % of the group members if the "Ohne Gentechnik"/"VLOG" food may be purchased locally by the branches. These audits are unannounced.

Based on the information provided by the group organiser in the group description (see Chapter H 1.1H 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.

#### **Follow-up Certification**

Each calendar year, the certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

10 % of the group members per year if "Ohne Gentechnik"/"VLOG" food is centrally purchased and traceability up until sale to the customer must be ensured (see Chapter H 3.11). These audits are announced.

10 % of the group members per year if "Ohne Gentechnik"/"VLOG" food is centrally purchased and traceability up until the service counter must be ensured (see Chapter H 3.11). These audits are unannounced.

100 % of the group members if the "Ohne Gentechnik"/"VLOG" food may be purchased locally by the branches. These audits are announced.

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.

#### **Effect of Audit Results on Labelling and Marketing**

If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with the "Ohne GenTechnik" seal is not permitted for the entire VLOG group.

Marketing of "VLOG" food may continue to be done by the retail group if individual retail group members are excluded from the group. In this case, "VLOG" marketing or marketing with the "Ohne GenTechnik" seal is no longer permitted only for the excluded group members.

#### **Certificate Issuance**

The certificate is to be issued to headquarters for the "bulk goods" area of application in accordance with Chapter A 3.11. The VLOG certificate must also indicate the category of products. The participating branches must be listed in an annex to the certificate.

The group organiser is to report changes to the list of members promptly to the certification body. It is the responsibility of the certification body to decide whether additional audits must be carried out.

For the Retail group certification, the member list must contain, for each branch the last routine audit date.

#### **Distribution of the Audit Report**

For each audit, the group organiser and/or the audited group member are to receive an audit report including any deviations found and measures to be implemented.

Explanation: The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

### **Commissioning of Multiple Certification Bodies**

If the group organiser commissions more than one certification body with auditing the group members:

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)

The groups must be organised such that each certification body independently audits 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 at the headquarters or at the retail 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.

# **Knock Out (KO) Requirements**

deleted

Contractually binding of the group members (H 2.3)

Risk management (H 2.4)

Incoming goods inspection (H 2.6)

Segregation of goods flows/exclusion of commingling and swapping (H 2.7)

Handling of non-compliant raw materials/products (H 2.10)

Traceability (H 2.12)

Crisis management (H 2.13)

# 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.

moved

### 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.

reworded and moved

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
  - List of products: Overview or specifications for bulk "Ohne Gentechnik" goods offered by the business, including consideration of re-working
- 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>2</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.). For further processing of bulk "Ohne Gentechnik"/"VLOG" goods and the use of further ingredients which are not purchased from VLOG-certified suppliers (e.g. marinades, mixed spices): a list of all formulations with quantity or weight related information on "Ohne Gentechnik" ingredients and components, including consideration of re-work

moved

- 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).

added

The retail group description must be kept up to date by the group organiser. The group organiser must promptly notify certification body of internal changes in the business pertaining to the

moved

<sup>&</sup>lt;sup>2</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.

certification. The current retail group description must be available at the retail group organiser and the retail group members.

For the audit, the updated group description, annexes, and documents listed therein must be submitted to the auditor for review. The current product and member list must be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

deleted

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

moved

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 and available at the respective group member. Deviating characteristics of individual branches are to be documented correspondingly in the group description.

deleted

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

added and moved

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

added and deleted

The requirements and obligations of the individual group's risk management

The contract (participation statement) must be signed by the group member.

### 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.)

added

- 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.

added

deleted

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.

-Explanation: If further ingredients (e.g. marinades) not procured from VLOG-certified suppliers or suppliers certified in accordance with another equivalent standard are added to the bulk "Ohne Gentechnik"/"VLOG" goods in the branch, the risk analysis must be expanded to assess the possibility of the use of flavourings, enzymes, microorganisms, additives, auxiliary substances, and other food ingredients, based on certificates provided by the suppliers. A template of a correct certificate confirming the GMO-free status of a product is included in the VLOG Standard, see Annex (1). The use of raw materials of animal origin is only permissible if they are certified under the VLOG Standard or a standard recognised to be equivalent.

# H 2.5 Procurement (Suppliers and Producer Certification) Approval of Suppliers and Articles

changed

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

reworded

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).

reworded

changed

# H 2.7 Segregation of Goods Flows/Exclusion of Commingling and Swapping 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.

Segregation measures, interim cleaning stages and production sequences are to be defined and implemented in a risk-oriented manner in the risk management.

deleted

### 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 by the Group Organiser

changed

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: Staff members of the group organiser involved in the operating processes of relevance to "VLOG" certification include, e.g. QM, Procurement etc.

deleted

Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): <a href="https://www.ohnegentechnik.org/staff">https://www.ohnegentechnik.org/staff</a> 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)

added

- 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.

added

# 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.

 $oldsymbol{i}$  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>3</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)).

added

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 (see Annex (35))

added

- the VLOG head office using the VLOG Incident Sheet (see 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.

#### 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.

added

<sup>&</sup>lt;sup>3</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 2.15 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

### **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
- (20) (20a) Facility Description Agriculture

(20b) Facility Description Agriculture Beekeepers

(21) (20c) Facility Description Animal Transport/Livestock Trade

(22) (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

changed

changed

changed

added

Name:

### **GMO-Free Certificate**

According to the VLOG "Ohne Gentechnik" Production and Certification Standard/EGGenTDurchfG

**Food Ingredients, Processing Aids and Other Substances** 

Phone/Fax:

Version: 01.09.22 Obligatory as of: 01.01.2023

#### Producer/Supplier

Street address:	Email:
City and postal code:	Country:
For the following product and all its ingredie	ents:
Product number supplier:	
Customer's product number:	
Exact product name:	
Status/version of the valid product specification*:	
Ingredients:	Last living organism(s)**

- \* This certificate shall be deemed to form part of the specifications referred to above. The specification mentioned is available for the customer.
- \*\* Please indicate the last living organism for all product ingredients that were used in the production process.
- (a) we certify that: The product and the food and food ingredients used to produce it contain no genetically modified organisms (GMOs); they do not consist of GMOs and are not produced from GMOs. Carryovers of GMOs are only tolerated if the GMO is approved in the EU and the detection limit of 0.1 % per ingredient is not exceeded. No GMOs were cultivated or released within 10 km of the beehives for apiary products. In the alternative, test results for the batch obtained according to VLOG requirements are available that show no genetic modification.
- (b) For ingredients of animal origin, we are in the possession of certificates in accordance with the VLOG Standard, the EU Regulation on Organic Production, or another standard recognised as equivalent.
- (c) No food, food ingredients, processing aids or other substances within the meaning of Sect. 3a (5) of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) (see Glossary) that are produced by GMOs have been used to prepare, treat, process or mix the food or food ingredients (depth of review: back to the last living organism in the production process). Processing aids and other substances within the meaning of § 3a (5) EGGenTDurchfG have not been used for the aforementioned purposes even if they or their components were labelled as consisting of GMOs, containing GMOs or produced from GMOs in accordance with Regulation (EC) No 1829/2003 or 1830/2003 or, if they had been placed on the market, would have had to be labelled.

### VLOG Annex 1

### **GMO-Free Certificate**

According to the VLOG "Ohne Gentechnik" Production and Certification Standard/EGGenTDurchfG

**Food Ingredients, Processing Aids and Other Substances** 

Version: 01.09.22 Obligatory as of: 01.09.23

We have suitable proof that requirements (a) to (c) were met for all components contained or used in the aforementioned product. Current declarations are on file. We have no evidence that raises doubts regarding compliance with the statutory requirements for the "Ohne Gentechnik" label. We agree to promptly send our customers/buyers and their certification body or licensing body a change notice or correction notice if this declaration is revoked or modified or if facts become known that raise doubts regarding compliance with statutory labelling requirements.

The certification or licensing body responsible for supervising the customer is authorised to verify the accuracy of this certification and to take samples for analytical evidence.

We assume liability for the accuracy of the statements in this declaration.

Name, Position

Place Date Signature Company stamp

#### **Glossary**

Changed

Term	Explanation
EGGenTDurchfG	German EC Genetic Engineering Implementation Act: German act on the implementation of European Community or European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes. The relevant requirements of §§ 3a and 3b of this Act for the ingredients and other substances used are shown in this certificate.
GMO - "genetically modified organism"	An organism, the genetic material of which has been modified in a way which is not naturally possible by cross-breeding and/or natural recombination, with the exception of organisms in which a genetic modification has been induced by the use of the processes listed in Annex 1B to Directive 2001/18/EC (Article 2(1)(5) of Regulation (EC) No 1829/2003).
"Produced from GMOs"	Wholly or partly derived from GMOs, but not consisting of or containing GMOs (Article 2(1)(10) of Regulation (EC) No 1829/2003).
"Produced by GMOs"	Derived by using a GMO as the last living organism in the production process, but not containing or consisting of GMOs nor produced from GMOs (Art. 2 letter v of Regulation (EC) No. 834/2007). (Art. 3 No. 60 of Regulation (EU) 2018/848).
"Living organism"	Any biological unit capable of reproducing or transferring genetic material (Art. 2 No. 1 of Directive 2001/18/EC, e.g. maize/corn grain; potato). The ability to propagate can be lost, for example, through crushing, drying or heating (e.g. maize/corn starch; potato starch).
Processing aids	Any substance not consumed as a food ingredient by itself, intentionally used in the processing of raw materials, foods or their ingredients, to fulfil a certain technological purpose during treatment or processing and which may result in the unintentional but technically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the finished product (Art. 2 letter y of Regulation (EC) No. 834/2007). (Art. 3 No. 65 of Regulation (EU) 2018/848).
"Other substances within the meaning of Sec. 3a (5) of the	Substances within the meaning of § 5 para. 2 of the Food Labelling Ordinance (LMKV) as amended in Ordinance of 18th December 2007. This includes:  Components of an ingredient that were temporarily removed during manufacturing and then
EGGenTDurchfG"	<ul> <li>added back into the food without exceeding their original quantity,</li> <li>Additives, aromas, enzymes and microorganism cultures that were contained in one or more ingredient of a food, as long as they no longer have a technological effect in the final product,</li> <li>Solutions and carrier substances for additives, aromas, enzymes and microorganism cultures, as long as they are used only in technologically necessary quantities</li> <li>Extraction solvents and</li> <li>Substances used in the same way and for the same purpose as processing aids and which are present in the finished product, even in an altered form.</li> </ul>
Standard recognised as equivalent	All standards recognized by VLOG as equivalent can be found here:  Standards recognised as equivalent

Supplier

# Certificate for "Ohne Gentechnik" Compliant Feeding of Animals

Version: 01.09.20 Obligatory as of: 01.01.21

Name:		Phone/Fax:	
Street address:		Email:	
City and postal of	code:	Country:	
We hereby conf	firm "Ohne Gentechnik" compliant	feeding for the following	ng animals/animal groups1:
Ear tag numbe animal/animal	r/stamp/other information uniquel groups	y identifying the	"Ohne Gentechnik" compliant feeding since <sup>2</sup> :
For othe	er animals see attachment <sup>3</sup> :		
aforementioned body or licensing	l animals/animal groups. We agree	to promptly send our cion notice if this declar	ompliant feeding were met for all the sustomers/buyers and their certification ation is revoked or modified or if facts
in on-site inspec		sampling or in suspiciou	o verify the accuracy of this confirmation is cases and to take samples for testing.
We assume liabi	lity for the accuracy of the stateme	ents in this declaration.	
Name, Position			
Place	Date	Signature	Company stamp

<sup>&</sup>lt;sup>1</sup> "Ohne Gentechnik" compliant feeding is understood to mean the exclusive use of feed that does not fall under the labelling obligation pursuant to EU Regulations (EC) Nos. 1829/2003 and 1830/2003. According to those regulations, feed may not be GMOs itself, contain components of GMO or have been produced from GMOs.

<sup>&</sup>lt;sup>2</sup> Please indicate the date from which the animal continuously received "Ohne Gentechnik" compliant feed. In case of interruptions, the counting or the minimum feed conversion period must start over.

<sup>&</sup>lt;sup>3</sup> Please indicate the name of the farm. In addition, please list in the attachment the date of certification, the animal and the date from which the "Ohne Gentechnik" compliant feeding started.

Place

## Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)

Version: 01.09.20 Obligatory as of: 01.01.21

I. Business ID and animal information Balis/VVVO No.:			Name:				
Street:			City and postal code:				
Phone	: Fax	<i>,</i> .	City and postal code:  Delivery date:				
riione	. Ta	Λ.	"Ohne Gentechnik"				
No.	Type of animal/species	Ear tag	Date of birth		sion date	VLOG-con	npliant*
1						Yes	No
2						Yes	No
3						Yes	No
4						Yes	No
5						Yes	No
Tota	Il number of animals to be slaught	tered:	•				
	tris of all arminars me. The fone	owing formula can be	used to make the calc	culation for c	e, or, in any o attle:		
Annex li II. Stai	Number of days of Ohne Ger Total number of Regulation on the Hygiene	ntechnik feeding (codays (date of birth Requirements for mal Origin (Anima on food safety in accor C) No. 853/2004 for a	nversion date to del until delivery date the Manufacture, Ti I Foodstuffs Hygiene dance with Appendix II S animals that were take	livery date) reatment a Regulation Section III No. en to or will b	attle:  - × 100 < 7  nd Market n - Tier-LMl 1 in conjunct be taken to a	HV) tion with Nos a slaughterho	nin s. 3 and 4
Annex li II. Stai	Number of days of Ohne Ger Total number of a Regulation on the Hygiene Foodstuffs of Ani 7 (to Sec. 10 para. 2) information t. b sentence 2 of Regulation (Endard Declaration	ntechnik feeding (co days (date of birth Requirements for mal Origin (Anima on food safety in accor C) No. 853/2004 for a nsible for the holding of on on the animal healt icate the presence of a	the Manufacture, Transcription of the Manufacture, Transcription of the Manufacture, Transcription of the Appendix II Stanimals that were taken of origin for the aforement the status at the holding of disease. The holding of	reatment as Regulation for origin, the	attle:  - × 100 < 7  nd Market n - Tier-LMI 1 in conjunct be taken to a als declares t health status aware of an	ing of Certa HV) tion with Nos a slaughterho he following: s of the anim	nin s. 3 and 4 buse. als and or
Annex li II. Star The foo	Regulation on the Hygiene Foodstuffs of Ani 7 (to Sec. 10 para. 2) information t. b sentence 2 of Regulation (Endard Declaration ad business operator who is respo There is no relevant informatic production data, which may ind regarding previous ante-mor 1a. Officially approved use of con	ntechnik feeding (co days (date of birth Requirements for mal Origin (Anima on food safety in accor C) No. 853/2004 for a nsible for the holding of on on the animal healt icate the presence of a tem and post-morter	the Manufacture, Transition of the artifacture, Transition of the Manufacture, Transition of the aforement of the status at the holding of the status of the	reatment as Regulation for to or will the forigin, the forigin is not aughtered ar	attle:  - × 100 < 7  nd Market n - Tier-LMI 1 in conjunct be taken to a als declares t health status aware of an	ing of Certa HV) tion with Nos a slaughterho he following: s of the anim	nin s. 3 and 4 buse. als and or
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Annex li II. Star The foc 1.	Regulation on the Hygiene Foodstuffs of Ani 7 (to Sec. 10 para. 2) information be sentence 2 of Regulation (Endard Declaration de business operator who is respo There is no relevant informatic production data, which may ind regarding previous ante-mor 1a. Officially approved use of cor There are no signs of disease th For seven days before the animal were  no waiting times for the formation of	ntechnik feeding (codays (date of birth) Requirements for mal Origin (Anima on food safety in accor C) No. 853/2004 for a nsible for the holding on on the animal healt icate the presence of a tem and post-morter ntrolled livestock condicat could affect the safe als were brought for slaterinary medicinal problems of the presence of a terrinary medicinal problems of the presence of a terrinary medicinal problems of the presence of a terrinary medicinal problems of the presence of the presenc	the Manufacture, Trail Foodstuffs Hygiene dance with Appendix II Sanimals that were taken of origin for the aforement his status at the holding disease. The holding of minspections of the slations in pig-farming facility of the meat. Stughter – and during the educts administered edicinal products repellents).	reatment as Regulation Section III No. en to or will be not or gin, the forigin is not aughtered arties. Yes entire fattening	attle:  - × 100 < 7  nd Market n - Tier-LMI 1 in conjunct be taken to a als declares t health status aware of an nimals. No  ng period for b	ing of Certa HV) tion with Nos a slaughterho he following: s of the anim y relevant in	nin s. 3 and 4 buse. als and or formatior

Date

Farmer's Signature

# Sampling Log GMO Testing

Version: 01.09.20 Obligatory as of: 01.01.21

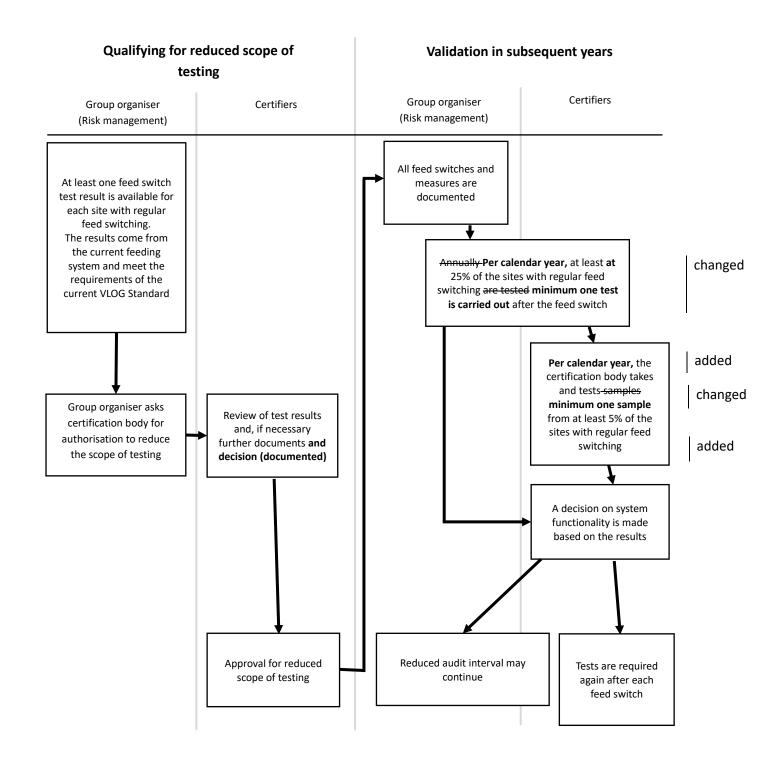
Company (designation, com	npany stamp	o, if applicable):			
Send test results to (email):					
Identification number (if ap	plicable):				
Sampling location, add sket	ch (if applic	able):			
Name of the sampler:					
Type of sample:	Seed	Feed	Raw m	aterial	Product
VLOG certification:	Yes	No			
Type/description:					
Manufacturer production date (if known):					
Lot number or internal num	nber:				
Best-before date (if available	le):				
Composition*, add attachm	ents (if app	licable):			
* For feed samples from or must be enclosed or spec the specification.					
Sample identification (spec	ific number	rs):			
The containers shall be labe	elled with th	e sample ID, the	sampling date and the	e facility number!	
Sample container # 1:					
Sample container # 2:					
Sample container # 3 (rema	ains in the c	ompany):			
Place, date	Signatu	re of Business/R	epresentative	Signature of sar	mpler/auditor

# Reduction of the Scope of Testing after Switching Feed in Group Organisations

Version: 01.09.22 Obligatory as of: 01.01.23

Process diagram for reducing the scope of testing in group certification at the agricultural stage. This flow chart only provides an overview of the certification process. Details can be found in Chapter  $\frac{E}{4.10.3}$  **E 4.10.5** 

changed



# Dealing with deviations and breaches

Version: 01.09.22 Obligatory as of: 01.01.23

Parts in table deleted

Events in operations that trigger sanctions	Sanction by certification body
Minor deviation (B-evaluation, not fulfilled)	Written notification
Breach of documentation obligations that can endanger the safety of the system (possible evaluation: not fulfilled, risk)	<ul> <li>(not a sanction in the actual sense but a means to avoid future violations)</li> <li>Stricter registration and reporting obligation</li> <li>Follow-up audit, if necessary</li> <li>Additional sampling and testing, if necessary</li> <li>Certificate issued only after implementation and verification of corrective action by the certification body</li> </ul>
Non-compliances or breaches that endanger "Ohne Gentechnik" food or "VLOG geprüft" feed, e. g. use of conventional raw materials, failure to comply with conversion periods, no segregation of batches, etc. (possible evaluation: not fulfilled, risk, KO)	<ul> <li>Warning letter</li> <li>Follow-up audit</li> <li>Additional sampling and testing, if necessary</li> <li>When evaluation reveals a risk: Certificate issued only after implementation and verification of corrective action by the certification body</li> <li>When evaluation is KO: revocation of the VLOG certificate within 2 business days</li> </ul>
Detection of GMOs in a tangibly affected quantity/batch or lot (e. g. a lot in a feed processing plant, etc.)	<ul> <li>Exclusion of non-compliant goods/products from the GMO-free claim</li> <li>Follow-up audit</li> <li>Additional sampling and testing, if necessary</li> </ul>
Repeated violation of VLOG Standard	<ul> <li>Warning letter</li> <li>Follow-up audit</li> <li>Additional sampling and testing, if necessary</li> <li>Suspension of certification with temporally limited marketing ban on "Ohne Gentechnik" foods or "VLOG geprüft" feeds</li> </ul>
<ul> <li>Major violations;</li> <li>Lack of willingness to comply with the guidelines;</li> <li>Misuse of the VLOG certificate for noncertified products/feed or use in a misleading way;</li> <li>Refusal of follow-up audit, or noncompliant follow-up audit (result) after suspension of certification</li> </ul>	<ul> <li>Termination of the monitoring contract</li> <li>Withdrawal of the VLOG certificate</li> </ul>

### **VLOG Certificate Template**

Version: 15.12.22 Obligatory as of: 01.01.23

#### **CERTIFICATE**

The certification body

**Sample Certification Body GmbH** 

(with) VLOG-Recognition No.: ZS-40####

confirms, pursuant to a recognition agreement with VLOG e.V. and an audit performed on ##.##.####, documented in a report, that the products/ feed and processes of

Sample Company GmbH & CO. KG

Official Registration No. (if available): #####

VLOG ID: 10-#####

Sample Street 1, 10101 Sample City

Germany

at location: #### (if necessary, refer to Annex ####) VLOG Sub-ID (if applicable): 10-####-A/B etc.

operating at the following stage and sub-stage for the area of applicability of the audit: (Annex 12, if necessary, with reference to Annex ##):

Stage	Sub-stage	Area of application
Logistics	Transport	Feed (bulk)
Logistics	Trade	Feed (packaged)
Feed manufacturing		Compound feed
Agricultiure	Animal production	Poultry – broiler chickens (turkey)
Food processing/preparation		Meat- floury (Poultry, Pig)
Food processing/preparation		Semi-hard cheese, hard cheese,
		soft cheese, Cream and cream
		products

meet the requirements of the VLOG "Ohne Gentechnik" Production and Certification Standard (**Version 23.01, 01.09.2022**), based on Sections 3a and 3b of the German EC Genetic Engineering Implementation Act (EGGenTDurchfG).

changed

The VLOG certification entitles you – under the condition of a licence agreement with VLOG – to use the "Ohne GenTechnik"/or "VLOG geprüft" seal.





Explanation: Which logo is used depends on the stage that is certified.

Report No. (if applicable): ######

Certification No1.: #####

Date of certification decision: ##.##.#### Certification valid until: ##.#####

Place, Date Name/Certifier's Signature

\_\_\_\_

<sup>&</sup>lt;sup>1</sup> A sequential number range or other uniquely identifiable numbering must be used for the certificate number, which excludes any confusion with a previous certificate version.

# **Areas of Application of VLOG Certification**

**Version:** 01.09.22 **Obligatory as of:** 01.01.23

deleted

The following areas of application of VLOG certification is more closely defined pursuant to Chapters A 2.1 and A 3.4.:

Parts in table deleted and changed

Stage	Sub-stage	Areas of Applicability
	Transport	Feed (bulk)     Food (bulk)
	Storage	Feed (bulk)     Food (bulk)
	Handling	Feed (bulk)     Food (bulk)
Logistics	Trade/	Feed (bulk)     Food (bulk)
	Drop shipping	<ul> <li>Feed (packaged)</li> <li>Including conversion of single-component feed to "VLOG geprüft"</li> </ul>
	Private Labelling	Feed (bulk)     Feed (packaged)
	Feed	Feed material     Feed additives
	manufacturing/ processing	Mineral feed     Lick blocks
Feed Manufacturing	processing	<ul> <li>Premixed Feed</li> <li>Compound feed (including complete and supplementary feed)</li> </ul>
	Mobile grinding an	d mixing facility
	Transport	Feed (bulk)     Food (bulk)
	Storage	Feed (bulk)     Food (bulk)
Matrix Certification	Handling	Feed (bulk)     Food (bulk)
	Trade/	Feed (bulk)     Food (bulk)
	Drop shipping	Feed (packaged)     Food (packaged)
		Including conversion of single-component feed to "VLOG geprüft"

# **Areas of Application of VLOG Certification**

Version: 01.09.22 Obligatory as of: 01.01.23

Stage	Sub-stage	Areas of A	pplicability		
	Private labelling Feed	Feed (bulk)      Feed material	Feed (packaged)      Feed additives		
Matrix Certification	manufacturing/ processing	<ul> <li>Feed material</li> <li>Mineral feed</li> <li>Lick blocks</li> <li>Premixed Feed</li> <li>Compound feed (including complete and supplementary feed)</li> </ul>			
	Mobile grinding an	d mixing facilities			
Agriculture	Animal production  Animal transport, I	<ul> <li>Cattle – cow's milk (raw)</li> <li>Cattle – dairy cows &amp; offspring¹ heifers/female calves (meat/animals)</li> <li>Cattle – suckler cows &amp; offspring¹</li> <li>Cattle – fat stock</li> <li>Cattle – breeding bull</li> <li>Pig – breeding piglets/sow keeping</li> <li>Pig – fattening pigs</li> <li>Pig – breeding animals</li> <li>Poultry – laying hens (meat/animals)</li> <li>Poultry – eggs</li> <li>Poultry – broiler chickens (stating the type – turkeys / chickens / ducks / geese)</li> <li>Poultry – pullets</li> </ul>	<ul> <li>Poultry – day-old chicks (stating the type turkey/chicken)</li> <li>Sheep – meat/animals</li> <li>Sheep – sheep's milk (raw)</li> <li>Goats – meat/animals</li> <li>Goats – goat's milk (raw)</li> <li>Horses</li> <li>Rabbits</li> <li>Farmed game</li> <li>Aquaculture (stating the type)</li> <li>Apiary – honey/bees</li> <li>Camels</li> </ul>		

1 Offspring includes calves (up to 6 months), young cattle (7-12 months), heifers/calves (offspring from 1 year) - indication on the certificate if individual animal categories are not VLOG-certified.

# Areas of Application of VLOG Certification

Version: 01.09.22
Obligatory as of: 01.01.23

Stage	Sub-stage	Areas of Ap	pplicability
Agricultural Group Organisation	Animal production	<ul> <li>Cattle – cow's milk (raw)</li> <li>Cattle – dairy cows &amp; offspring¹ heifers/female calves (meat/animals)</li> <li>Cattle – suckler cows &amp; offspring¹</li> <li>Cattle – fat stock</li> <li>Cattle – breeding bull</li> <li>Pig – breeding piglets/sow keeping</li> <li>Pig – fattening pigs</li> <li>Pig – breeding animals</li> <li>Poultry – laying hens (meat/animals)</li> <li>Poultry – eggs</li> <li>Poultry – broiler chickens (stating the type – turkeys / chickens / ducks / geese)</li> <li>Poultry – pullets</li> </ul>	<ul> <li>Poultry – day-old chicks (stating the type turkey/chicken)</li> <li>Sheep – meat/animals</li> <li>Sheep – sheep's milk (raw)</li> <li>Goats – meat/animals</li> <li>Goats – goat's milk (raw)</li> <li>Horses</li> <li>Rabbits</li> <li>Farmed game</li> <li>Aquaculture (stating the type)</li> <li>Apiary – honey/bees</li> <li>Camels</li> </ul>
Food Processing/ Preparation	N.A.	<ul> <li>Slaughtering (cattle)</li> <li>Slaughtering (pigs)</li> <li>Slaughtering (poultry)</li> <li>Slaughtering (fish/ seafood stating the type)</li> <li>Slaughtering (rabbits)</li> <li>Cutting (cattle)</li> <li>Cutting (pigs)</li> <li>Cutting (poultry)</li> <li>Cutting (fish/ seafood stating the type)</li> <li>Cutting (rabbits)</li> </ul>	<ul> <li>Fruit preparations</li> <li>Fruit spread</li> <li>Fruit juices</li> <li>Milk products with fruit preparations</li> <li>Prepared milk beverages (flavoured milk drinks)</li> <li>Pudding, cream dishes, desserts, sweet sauces</li> <li>Butter, butterfat</li> <li>Margarine</li> <li>Milk substitute products</li> <li>Hard cheese</li> <li>Semi-hard cheese/sliced cheese</li> </ul>

# Areas of Application of VLOG Certification

**Version:** 01.09.22 **Obligatory as of:** 01.01.23

Stage	Sub-stage	Areas of A	Applicability
Food Processing/ Preparation		<ul> <li>Fish products</li> <li>Meat – floury (stating the animal species)</li> <li>Meat – spiced/marinated (stating the animal species)</li> <li>Meat products (stating the product: firm/spreadable raw sausage, parboiled sausages, parboiled sausages spreadable cooked sausage, black pudding, jellied brawn, pâté, liver sausage, cooked mettwurst, heat cheese, cooked/raw salted meat, corned meat)</li> <li>stock, broth, bouillon (stating the animal species)</li> <li>stock, broth, bouillon (vegetable)</li> <li>Dairy (whole milk, skimmed milk)</li> <li>Dairy (raw milk)</li> <li>Fermented milk products</li> <li>Refir products</li> <li>Kefir products</li> <li>Kefir products</li> <li>Cream and Cream products</li> <li>Coffee cream</li> <li>Unsweetened evaporated milk products</li> <li>Sweetened condensed milk products</li> <li>Whey and Whey products</li> <li>Skim milk concentrate/whey concentrate</li> </ul>	le • Brine cheese  e, • Pasta filata cheese  Processed cheese, processed cheese preparation

# **Areas of Application of VLOG Certification**

**Version:** 01.09.22 **Obligatory as of:** 01.01.23

Stage	Sub-stage	Areas of Applicability							
Food Processing/ Preparation		<ul> <li>Meat substitute products</li> <li>Vegetable spreads and dips</li> <li>Eggs</li> <li>Cooked, coloured eggs</li> <li>Whole egg liquid, egg yolk liquid, egg white liquid</li> <li>Whole egg powder, egg yolk powder, egg white powder</li> <li>Sucrose (Sugar from sugar beet)</li> <li>Sucrose (Sugar from sugar cane)</li> <li>Liquid sugar</li> <li>Invert sugar syrup</li> <li>Glucose, Glucose syrup</li> <li>Fructose and fructose syrup</li> <li>Honey</li> <li>Confectionery</li> </ul>	<ul> <li>Cooking fat (stating the type)</li> <li>Cooking oil (stating the type)</li> <li>Beer</li> <li>Pasta</li> <li>Grain and Grain products</li> <li>Cookies</li> <li>Spices, blend of spices, marinades</li> <li>Stabiliser</li> <li>Enzyme, enzyme preparations</li> <li>Processing aids</li> <li>Cut/shred (stating the product)</li> <li>Grate (stating the product)</li> </ul>						
Retail	N.A.	<ul><li>Bulk meat products</li><li>Bulk meat products spiced/marinated</li></ul>	Bulk cheese products     Bulk cheese product spiced/marinated						

Other areas of applications ca be issued after consultation with VLOG

# **VLOG Facility Description Logistics Stage**

**Version** 01.09.22

#### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business.

Name of business			
Official approval or registration number (in accordance with Regulation EC No. 183/2005)			
Address/location of the business (including country code)			
Contact person & contact data (e.g., telephone, e-mail address)			
VLOG-ID <sup>1</sup> or matrix organiser			
Description of activities			
Areas of application of VLOG (cf. Annex 12 of the VLOG Standar		Portion VLOG (%) of the total production	Annual tonnage VLOG of outgoing goods
☐ Transport			
☐ Storage			
☐ Handling			
☐ (Drop) shipping			
☐ incl. conversion o	of single component		
feed to "VLOG gepri			
	лі ( <u> </u>		
☐ Private Labelling			
<u>Of</u>			
☐ Feed			
□ Food			
Use of the "VLOG geprüft" an	d/or the "Ohne GenTo	echnik" seal	
			e following documents/media
- I I		ence agreement with VLOG	_
_ Labels, _	Delivery slips, _	Othe	r media
declarations	invoices	Website	rs, catalogues, etc.)
		()	-,

 $<sup>^{\</sup>mathrm{1}}$  10-xxxxx cf. Standard Usage Agreement with VLOG

# VLOG Facility Description Logistics Stage

**Version** 01.09.22

#### PART 2: ORGANISATION OF "VLOG" PRODUCTION

Othe	er sites				
	No other sites are included	ded in the VLOG certification.			
	The following sites are i	ncluded in the VLOG certificat	tion:		
Nar	ne of the business	Address		Activity/	process
∐ Fo	or others, see informal att	tachment			
Subc	entractors/contract proc	<del>cessors</del> External Service Provi	iders		chang
	•	sses subject to certification u		G Standar	d have been awarded or
	· ·	ties (subcontractors/contract		-	
		and processes subject to ce	ertification un	der the VI	LOG Standard have been
	outsourced:	T =	T _		T
	Activity or process	Business engaged (name, address)	Contact pa		Certification status (VLOG-certified/certified
		aduress)	and contac	l uala	under a standard recognised
					as equivalent or included in
					the business' own VLOG certification)
	☐ For others, see inf	ormal attachment			<u>,                                      </u>
D 4 D	T 2 CARADUNIC 0 CRAC	TECTING			أمام
PAK	T 3: SAMPLING & GMC Sampling and testing ar				added
		sport and/or transhipment			
	•	per-proof, packaged goods (e.	g., feed as sac	ked goods	s, food in its final
	packaging, etc.).	, ,, , , , , , , , , , , , , , , , , , ,	<i>.</i>	J	,
	☐ Trading of feed: Tr	ade and transport exclusively	y without (int	erim) stor	age
	_	terials/products (food): Only \	/LOG-certified	l or certifie	ed under another
	standard recognise  Drop shipping with	ed as equivalent. <b>nout</b> conversion of feed to "VL	OG goprüft"		
		f feed <b>without</b> taking physical		f hulk good	de .
_	_	- ,			
	•	ng (reference samples) and tes	_	nd/or foo	d in "Ohne Gentechnik"
	□ Trading of "VLOG g	ss has a written sampling and genrüft" feed	testing plan:		
	-	ipping <b>with</b> conversion of fee	d to "VLOG ge	prüft" aua	ality
	= -	feed <b>with</b> taking physical pos	_	-	•
	☐ Trading of VLOG fo			-	

## VLOG Facility Description Logistics Stage

Version 01.09.22

#### **PART 4: DOCUMENTS TO BE PREPARED**

The following information must be provided to the certification body/auditor, or must be examined during the audit:

- List of all stored, transported, transferred, and traded raw materials, food and feed of the "VLOG" and "VLOG-geprüft" section. The list must include, at a minimum, the following information:
  - o Exact description of the raw material, food or feed
  - o Record of available GMO documentation (e.g. VLOG non-GMO certification, specification, delivery slip)
- List of all suppliers of "VLOG" products and "VLOG-geprüft" feed (products with the "Ohne Gentechnik" seal or feed with "VLOG-geprüft" seal)

#### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. I/we hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

Business:	
Identification number if available:	
VLOG-ID (10-xxxxx) or Matrix organiser:	
Audit participant business:	
Sites that have been audited (incl. adress):	
Scano of contifications	
Scope of certification:	

Date of audit:			
Duration of audit (time from - to):			
buration of addit (time from - to).			
Auditor:			
Responsible certification body:			
Combination with other standard(s):			
Focus of facility inspection:			
Sampling during audit:	□yes	□no	
Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□yes	□no	
Is there a Licence Agreement with VLOG in place?	□yes	□ no	

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	290
Number of evaluated criteria	0

Audit result	
Achieved percentage:	
missing or incorrect entries!	
not passed	

Auditor's signature:

Business's signature:

			Gradin	ıg (plea	se sele	ct with	ı " x ")		Corrective actions		
No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
Standard			10 pts	5 pts	-10	N.A.	not			uates/status (business)	
					pts		passed				
B 2	General Requirements										
B 2.1	Standard Usage Agreement with VLOG										
B 2.2	Facility Description										
B 2.3	Assignment of Responsibilities, Organisational Chart										
B 2.4	Risk Management	ко									
B 2.5	Commissioning External Service Providers										
B 2.6	Segregation of Goods Flows/Exclusion of Contamination	ко									

No. in	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/
Standard										dates/status (business)
			10 pts			N.A.	not			
					pts		passed			
B 2.7	Handling of Non-Compliant Feed, Raw	ко								
	Materials and Products									
B 2.8	Outgoing Goods Control, Labelling on									
	Bills of Lading									
B 2.9	Traceability	ко								
D 2.3	Traceability	KO								
B 2.10	Complaint Management									
B 2.11	Goods Recall									
B 2.12	Crisis Management	ко								
	-									
							1			

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)			
			10 pts	5 pts	-10 pts	N.A.	not passed						
B 2.13	Corrective Action, Ongoing Improvement Process												
B 2.14	Documentation and Retention Period												
B 2.15	Staff Training												
B 2.16	Internal Audits												
	Handling	If this sub-stage is not relevant for the business, all points are graded as N.A If the sub-stage is relevant, KO criteria may not be graded as N.A.											
B 3.1	Incoming Goods Inspection	КО											

No. in Standard	Topic in Standard		А В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)				
			10 pts 5	pts -10 pts	N.A.	not passed							
B 4	Specific Requirements for Trade	are	If this sub-stage is not relevant for the business, all points are graded as N.A If the sub-stage is relevant, KO criteria may not be graded as N.A.										
B 4.1	Incoming Goods Inspection	КО											
B 4.2	Sampling and Testing												
B 4.2.1	Sampling and Testing Plan												
B 4.2.2	Sampling and Commissioning a Laboratory												
B 4.2.3	Frequency of Sampling and Testing												
B 4.2.4	Evaluation of Test Results												
B 5	Specific Requirements for Drop Shipping	If this sub-stage is not relevant for the business, all points are graded as N.A If the sub-stage is relevant, KO criteria may not be graded as N.A.											
B 5.1	Incoming Goods Inspection	ко											

No. in Standard	Topic in Standard		A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)			
			10 pts		-10 pts	N.A.	not passed						
В 6	of Feed to "VLOG geprüft"	If this sub-stage is not relevant for the business, all points are graded as N.A If the sub-stage is relevant, KO criteria may not be graded as N.A.											
B 6.1	Specific Requirements for Risk Management												
B 6.2	Sampling and Testing for Conversion												
В 7	Labelling of Feed	If this sub-stage is not relevant for the business, all points are graded as N.A If the sub-stage is relevant, KO criteria may not be graded as N.A.											
B 7.1	Certification Status of Contract Manufacturers	ко											
B 7.2	Contractual Agreement between Private Labeller and Contract Manufacturer	ко											
В 7.3	Incoming Goods Inspection												
B 7.4	Sampling and Testing												

# **VLOG Facility Description Feed Manufacturing Stage**

**Version** 01.09.22

#### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business. A separate VLOG facility description is available for VLOG-certified operators of mobile grinding and mixing facilities (VLOG Standard Annex 17).

Nar	me of business				
regi (in a	icial approval or istration number accordance with Regulation Io. 183/2005)				
	dress/location of the liness (including country e)				
	ntact person & contact a (e.g., telephone, e-mail ress)				
_	DG ID <sup>1</sup> or matrix aniser				
Des	cription of activities				delete
	as of application of VLOG Annex 12 of the VLOG Standard		Portion VLOG (%) of the total production	Annual tonnage VLOG of outgoing goods	
	Feed material				
	Compound feed				
₽	<b>Mineral feed</b>				
	Lick blocks				
	Feed additives				
	Premixed feed				
	drop shipping, private la	abelling of fee	d) that are subject to co	cs (transport, handling, storage, tracertification. The VLOG facility descrip	
	for the stage of Logistics		ard Annex 13) is attache	ed.   O Facility	descripti Logist
Use (	of the "VLOG geprüft" se The "VLOG geprüft" sea licence agreement with	al is used on t	~	ts/media to label VLOG-certified fee	d. A
	Labels, declarations		lips,   Website	Other media (flyers, catalogue etc.)	es,

 $<sup>^{\</sup>mathrm{1}}$  10-xxxxx cf. Standard Usage Agreement with VLOG

# **VLOG Facility Description Feed Manufacturing Stage**

**Version** 01.09.22

No other sites are included in the "VLOG geprüft" production.  The following sites are included in the "VLOG geprüft" production and certification:							
Name of the business	Activity/process						
☐ For (	others, se	ee informal attachment					
ontractors/cont	ract proc	<del>essors</del> External Service Provi	ders	ch			
No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).  The following activities and processes subject to certification under the VLOG Standard have been outsourced:							
Activity or process		Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/certified under a standard recognised as equivalent or included in the business' own VLOG certification)			
☐ For other	s see info	ormal attachment					
Feed, technica present in the	l process business/	Ibelling in the business/at the ing aids, or other production at the site. It is a converted fully to "VLOG goes to be a converted fully to the converted fully to be a converted fu	n means subject to con	mpulsory labelling are not			
☐ The busin "VLOG ge	ess/site ¡ orüft" fee	processes or prepares feed need.	ot subject to compulso				
Feed, technical processing aids, or other production means subject to compulsory labelling are present in the business/at the site.  The separation between "VLOG geprüft" production and GMO production is organised as follows:  Temporal segregation  Spatial segregation							

# **VLOG Facility Description Feed Manufacturing Stage**

**Version** 01.09.22

#### **PART 3: SAMPLING & GMO TESTING**

GM	O testing is necessary to protect "VLOG geprüft" production. The business has a written sampling and
testi	ing plan.
	Risk-prone feed at goods receiving
	GMO monitoring of outgoing goods

### **PART 4: DOCUMENTS TO BE PREPARED**

The following information must be provided to the certification body/auditor, or must be examined during the audit:

- List of all feed, auxiliary substances, and other production means used in "VLOG geprüft" feed. The list must include, at a minimum, the exact description of the feed, auxiliary substances, and/or other production means.
- Product list of "VLOG geprüft" feed types (including B2B feeds)

#### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. We hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

# **VLOG Combined Facility Description Feed Manufacturing and Logistics Stage**

Version 01.09.22

#### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business. A separate VLOG facility description is available for VLOG-certified operators of mobile grinding and mixing facilities (VLOG Standard Annex 17).

Naı	me of business				
reg (in a	icial approval or istration number accordance with Regulation No. 183/2005)				
	dress/location of the siness (including country e)				
dat add	ntact person & contact a (e.g., telephone, e-mail ress)				
	OG ID¹ or matrix aniser				
	cription of Logistics				deleted
	eas of application of VLOG Annex 12 of the VLOG Standar		Portion VLOG (%) of the total production	Annual tonnage VLOG of outgoing goods	
Feed Manufacturing					
	☐ Feed material				
	☐ Compound feed				
	☐ Mineral feed				
	☐ Lick blocks				
	☐ Feed additives				
	☐ Premixed feed				
Lo	gistics				
	☐ Transport				
	☐ Storage				
	☐ Handling				
	☐ (Drop) shipping ☐ incl. conversion component feed	on of single- I to "VLOG geprüft"			
	☐ Private Labelling				

 $<sup>^{1}</sup>$  10-xxxxx cf. Standard Usage Agreement with VLOG

# **VLOG Combined Facility Description Feed Manufacturing and Logistics Stage**

**Version** 01.09.22

**PART 1: BUSINESS PARAMETERS** 

	of the "VLOG gentle The "VLOG gentle Ilicence agreemed Labels, declaration to the Cartesian and the Ca	orüft" sea ent with ns	al is used on VLOG is on Delivery invoices	file: slips,		Website		med			G-certified feed. A yers, catalogues,
	r sites										
	No other sites a	are includ	ded in the "\	/LOG ger	prüft"	product	ion.				
	The following si					-		n ar	nd certific	ation:	
	Name of the business	Address	S								Activity/process
-											
-											
	☐ For o	others, se	ee informal	attachm	ent						_
Subc	ontractors/cont	ract proc	occore Fyte	rnal Serv	vice P	roviders					change
	Change  No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).  The following activities and processes subject to certification under the VLOG Standard have been										
Г	outsourced:		-			ı					
	Activity or proc	ess	Business e address)	ngaged (	name	- 1	ontact nd con	•	tner(s)	(VLOG under as equ	fication status f-certified/certified a standard recognised livalent or included in lisiness' own VLOG cation)
	☐ For others	s, see info	ormal attach	nment							

# **VLOG Combined Facility Description Feed Manufacturing and Logistics Stage**

Version 01.09.22

### TEIL 2: ORGANISATION DER "VLOG"-PRODUKTION

Feed	subject to compulsory labelling in the business/at the site  Feed, technical processing aids, or other production means subject to compulsory labelling are not present in the business/at the site.
	☐ The business/site has converted fully to "VLOG geprüft" production.
	☐ The business/site processes or prepares feed not subject to compulsory labelling in addition to "VLOG geprüft" feed.
	Feed, technical processing aids, or other production means subject to compulsory labelling are present in the business/at the site.
	The separation between "VLOG geprüft" production and GMO production is organised as follows:  ☐ Temporal segregation ☐ Spatial segregation
PAR	T 3: SAMPLING & GMO TESTING
GM	manuacturing:  O testing is necessary to protect "VLOG geprüft" production. The business has a written sampling and ing plan.
	Risk-prone feed at goods receiving
	GMO monitoring of outgoing goods
Logis	tics: added
	Sampling and testing are <u>not required</u> :
	☐ Only storage, transport and/or transhipment
	☐ Trading: Only tamper-proof, packaged goods (e.g., feed as sacked goods)
	☐ Trading of feed: Trade and transport exclusively without (interim) storage
	☐ Trading of feed: Only VLOG-certified or certified under another standard recognised as equivalent.
	☐ Drop shipping without conversion of feed to "VLOG geprüft"
	☐ Private Labelling of feed <b>without</b> taking physical possession of bulk goods
	Requirement of sampling (reference samples) and testing of feed in "Ohne Gentechnik" production.
	The business has a written sampling and testing plan:
	☐ Trading of "VLOG geprüft" feed
	☐ Trading or Drop shipping <b>with</b> conversion of feed to "VLOG geprüft" quality
	☐ Private labelling of feed <b>with</b> taking physical possession of bulk goods

#### **PART 4: DOCUMENTS TO BE PREPARED**

The following information must be provided to the certification body/auditor, or must be examined during the audit:

- List of all stored, transported, transferred, traded and produced feed s of the "VLOG-geprüft" section. The list must include, at a minimum, the following information:
  - o Exact description of the feed, processing aid, other production means or product group
  - Record of available GMO documentation (e.g. VLOG non-GMO certification, specification, delivery slip, reference to Regulation (EC) 834/2007)
- Feed manufacturing: Product list of "VLOG geprüft" feed (including B2B feed)
- Logistics: List of all suppliers of "VLOG-geprüft" feed

# **VLOG Combined Facility Description Feed Manufacturing and Logistics Stage**

**Version** 01.09.22

### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. We hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

### VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage C\_Feed Manufacturing

Business:	
Identification number if available:	
VLOG-ID (10-xxxxx) or Matrix organiser:	
Audit participant business:	
Sites that have been audited (incl. adress):	
Scope of certification:	
	□ dual
Dual production or production of feed that is not subjected to compulsory labelling?	□ not subjected to compulsory labelling
Scope of certification:  Dual production or production of feed that	

Date of audit:		
Duration of audit (time from - to):		
Auditor:		
Responsible certification body:		
Combination with other standard(s):		
Focus of facility inspection:		
Sampling during audit:	□yes	□ no
Is the "VLOG geprüft" seal used?	□yes	□no
Is there a Licence Agreement with VLOG in place?	□yes	□no

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	270
Number of evaluated criteria	0

Audit result
Achieved percentage:
missing or incorrect entries!
not passed

Auditor's signature:	

Business's signature:

		Grad	ing (plea	se sele	ct with	" x ")		Corrective actions		
No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10 pt	s 5 pts	-10 pts	N.A.	not passed				
C 2	General Requirements									
C 2.1	Standard Usage Agreement with VLOG									
C 2.2	Facility Description									
C 2.3	Assignment of Responsibilities, Organisational Chart									
C 2.4	Risk Management K	0								
C 2.5	Commissioning External Service Providers									

No. in Standard	Topic in Standard	4	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
C 2.6	Incoming Goods Inspection									
C 2.7	Segregation of Goods Flows, Exclusion of Contaminations	ко								
C 2.8	Handling of Non-Compliant Feed	ко								
C 2.9	Traceability K	ко								
C 2.10	Complaint Management									
C 2.11	Goods Recall									

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
C 2.12	Crisis Management	ко								
C 2.13	Corrective Action, Ongoing Improvement Process									
C 2.14	Documentation and Retention Period									
C 2.15	Staff Training									
C 2.16	Internal Audits									

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts	N.A.	not passed			
C 3	Manufacturing/Processing	If this sub- are graded may not be	as N.A.	. If the s	ub-sta	or the businge is releva	ness, all points ant, KO criteria		
C 3.1	Sampling and Testing								
C 3.1.1	Sampling and Testing Plan								
C 3.1.2	Sampling and Commissioning a laboratory								
C 3.1.3	Frequency of Sampling and Testing								
C 3.1.4	Evaluation of Test Results								
C 3.2	Reference Samples								
C 3.3	Outgoing Goods Control, Labelling on Bills of Lading								

No. in Standard	Topic in Standard	А	E	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10	) pts 5	5 pts	-10 pts	N.A.	not passed				
C 4	Grinding and Mixing Facilities	If this sub-stage is not relevant for the business, all points are graded as N.A If the sub-stage is relevant, KO criteria may not be graded as N.A.									
C 4.1	Specific Measures to Eliminate Contaminations										
C 4.2	Safeguarding with a Carryover Test										
C 4.3	Mixing Documentation and Mixing Protocols										
C 4.4.1	Sampling Permission										
C 4.5	Identification on Bills of Lading										

### VLOG "Ohne Gentechnik" Production and Certification Standard - Combi-Checklist Stages B+C\_Feed Manufacturing+Logistics

V23.01

Business:	
Identification number if available:	
VLOG-ID (10-xxxxx) or Matrix organiser:	
Audit participant business:	
Sites that have been audited (incl. adress):	
Scope of certification:	
	□ dual
Dual production or production of feed that	□ not subjected to compulsory labelling
is not subjected to compulsory labelling?	

Date of audit:			
Duration of audit (time from - to):			
Auditor:			
Responsible certification body:			
Combination with other standard(s):			
Focus of facility inspection:			
Sampling during audit:	□yes	□no	
Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□no	
Is there a Licence Agreement with VLOG in place?	□ yes	□no	

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	400
Number of evaluated criteria	0

Audit result	
Achieved percentage:	
missing or incorrect entries!	
not passed	

Auditor's signature:	

Business's signature:

		Gradi	ng (plea	se sele	ct with	" x ")		Corrective actions		
No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10 pts	5 pts	-10 pts	N.A.	not passed				
C 2	General Requirements for Feed Manufactu	ring and	Logistic	s Stage						
C 2.1	Standard Usage Agreement with VLOG									
C 2.2	Facility Description									
C 2.3	Assignment of Responsibilities, Organisational Chart									
C 2.4	Risk Management Ko	)								
C 2.5	Commissioning External Service Providers									

No. in Standard	Topic in Standard	4	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
C 2.6	Incoming Goods Inspection									
C 2.7	Segregation of Goods Flows, Exclusion of Contaminations	ко								
C 2.8	Handling of Non-Compliant Feed	ко								
C 2.9	Traceability K	ко								
C 2.10	Complaint Management									
C 2.11	Goods Recall									

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
C 2.12	Crisis Management	ко								
C 2.13	Corrective Action, Ongoing Improvement Process									
C 2.14	Documentation and Retention Period									
C 2.15	Staff Training									
C 2.16	Internal Audits									

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts	N.A.	not passed			
C 3	Manufacturing/Processing	If this sub- are graded may not be	as N.A.	. If the s	ub-sta	or the businge is releva	ness, all points ant, KO criteria		
C 3.1	Sampling and Testing								
C 3.1.1	Sampling and Testing Plan								
C 3.1.2	Sampling and Commissioning a laboratory								
C 3.1.3	Frequency of Sampling and Testing								
C 3.1.4	Evaluation of Test Results								
C 3.2	Reference Samples								
C 3.3	Outgoing Goods Control, Labelling on Bills of Lading								

No. in Standard	Topic in Standard	А	E	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10	) pts 5	5 pts	-10 pts	N.A.	not passed			
C 4	Grinding and Mixing Facilities		ded a	s N.A.	. If the	sub-sta		ness, all points ant, KO criteria		
C 4.1	Specific Measures to Eliminate Contaminations									
C 4.2	Safeguarding with a Carryover Test									
C 4.3	Mixing Documentation and Mixing Protocols									
C 4.4.1	Sampling Permission									
C 4.5	Identification on Bills of Lading									

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)		
			10 pts	5 pts	-10 pts	N.A.	not passed					
В 3	Specific Requirements for Storage and Handling	are g	is sub-s graded not be	as N.A.	not rel	sub-sta	or the busin	ness, all points ant, KO criteria				
B 3.1	Incoming Goods Inspection	КО										
B 4	Specific Requirements for Trade	are g	graded	s sub-stage is not relevant for the business, all points graded as N.A If the sub-stage is relevant, KO criteria not be graded as N.A.								
B 4.1	Incoming Goods Inspection	КО										
B 4.2	Sampling and Testing											
B 4.2.1	Sampling and Testing Plan											
B 4.2.2	Sampling and Commissioning a Laboratory											
B 4.2.3	Frequency of Sampling and Testing											
B 4.2.4	Evaluation of Test Results											

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation		Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts		not passed			
B 5	Shipping	this sub-stage is not relevant for the business, all points re graded as N.A If the sub-stage is relevant, KO criteria nay not be graded as N.A.							
В 5.1	Incoming Goods Inspection K	0							
В 6			as N.A.	If the	sub-sta		ness, all points ant, KO criteria		
B 6.1	Specific Requirements for Risk Management								
B 6.2	Sampling and Testing for Conversion								

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)				
			10 pts		-10 pts	N.A.	passed							
B 7	Labelling of Feed	pelling of Feed are graded					s sub-stage is not relevant for the business, all points graded as N.A If the sub-stage is relevant, KO criteria not be graded as N.A.							
B 7.1	Certification Status of Contract Manufacturers	КО												
B 7.2	Contractual Agreement between Private Labeller and Contract Manufacturer	ко												
В 7.3	Incoming Goods Inspection													
B 7.4	Sampling and Testing													

## VLOG Facility Description Feed Stage - Mobile Grinding and Mixing Facilities

Version 11.02.22

### PART 1: BUSINESS PARAMETERS

Please fill out all tables completely, and always check the answers that are applicable to your business.

		•
Name of business		
Address of the business (including country code)		
Official registration number, if applicable (in accordance with Regulation EC No. 183/2005)		
Contact person & contact data (e.g., telephone, e-mail address)		
VLOG ID <sup>1</sup> or matrix organiser		
Description of activities		
Activity area in the VLOG production	Portion VLOG (%) of the total production	Annual tonnage VLOG
Mobile grinding and/or mixing facility		
☐ Trading of oils and fats ☐ Oils and fats of "VLOG geprüft" quality ☐ Oils and fats not subject to compulsory ☐ Oils and fats subject to compulsory labe	•	

<sup>&</sup>lt;sup>1</sup> (10-xxxxx cf. Standard Usage Agreement with VLOG)

# VLOG Facility Description Feed Stage - Mobile Grinding and Mixing Facilities

Version 11.02.22

### PART 2: ORGANISATION OF VLOG MIXTURES

Mobile grinding and/or mixing facilities involved in VLOG production

Vehicle ID number	Official license plate	Last review by the auditor	Process	sing of	Measures established	d for dual use	Date of last carryover test
			exclusively feed not subject to compulsory labelling	feed subject to compulsory labelling	System purge, including minimum quantity (in kg)	Complete discharge	

## VLOG Facility Description Feed Stage - Mobile Grinding and Mixing Facilities

Version 11.02.22

### PART 3: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. I/we hereby declare the correctness of the information provided above:

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

# Template for Matrix Description including Site List

Version: 01.09.2021

The following document is a sample template for a matrix description. A matrix description must be submitted to the certification body at the time of the application. The matrix organiser must notify the certification body of major changes pertaining to VLOG certification.

### Matrix description of "SaMa GmbH" sample matrix

Matrix organiser:

SaMa GmbH

Sample street 12, 54321 Sample town

Responsible for matrix certification:

Sam Sample (QM Officer of Sample GmbH)

Telephone: 0123 4567 89 Email: s.sample@samagmbh.com

Activities of matrix members:

Sample text: The members of the SaMa VLOG matrix are businesses engaged in transportation, storage and feed manufacturing in accordance with the VLOG Standard [...].

The sites are mainly located in the administrative districts/federal states/countries of [...].

In part, the sites are engaged in other activities such as cattle and pig fattening or egg production [...]; however, these activities are not part of the SaMa VLOG matrix.

Contractors, subcontractors and outsourced processes:

The following contractors are included in the SaMa matrix:

Feedmill GmbH, Feedstreet 8, 12345 Sampleville

Contact person:

Contact information:

On behalf of SaMa GmbH [...]

• [...]

Responsibilities of the matrix organiser:

Sample text: SaMa prepares and monitors the matrix's sampling and test plan [...] It arranges for sampling within the scope of the VLOG audit by a certification body [...]

SaMa arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective measures together with the affected companies [...].

SaMa is responsible for risk management and has instituted a crisis management system that involves the matrix members [...].

SaMa GmbH carries out an internal audit of the sites annually.

# Template for Matrix Description including Site List

Version: 01.09.2021

[...]

Basis for the initial and subsequent certifications

Sample text: The matrix operates according to the 33% method: the matrix organiser audits 100% of the sites; after that the certification body audits at least 33% of the sites. In the following years, the audits by the certification body depend on the scope of applicability.

Or:

The matrix operates according to the 100% method: 100% of the sites are audited by the certification body before they can be added to the matrix. In the following years, the audits by the certification body depend on the scope of applicability.

# Template for Matrix Description including Site List

Version: 01.09.2021

Below is a template for a list of sites for matrix certification in logistics and feed production. The matrix organiser must always keep the list of sites up to date. The matrix organiser must promptly notify the certification body of any relevant changes. The following site list or a site list with equivalent content may be used. [Information in boldface is mandatory according to the Standard; the remainder is recommended.]

### Site list of SaMa GmbH

Name/ Site	Business	Address	Scope of applicability for VLOG certification	Matrix site since	Initial sampling by the matrix organiser (for 33% method)	Most recent routine audit/initial audit by the certification body
Feedmill Sample town site	Sample GmbH	Sample street 2, 87654 Sample town	Feed production	[Date]	[Date]	[Date]
Transpofix Sampleville site	Transpofix GmbH	Sample street 1, 54321 Sampleville	Transport, storage	[Date]	[Date]	Has not yet taken place
[]						

Business:			Date of audit:		
			Duration of audit (time from - to):		
			buration of addit (time from - to).		
Identification number if available:			Auditor:		
VLOG-ID (10-xxxxx):			Responsible certification body:		
Audit participant business:			Combination with other standard(s):		
Sites that have been audited (incl. adress):			Focus of facility inspection:		
			Is the "VLOG geprüft" seal used?	□yes	□no
Scope of certification:			Is there a Licence Agreement with VLOG in place?	□yes	□no
Grading		]	Audit result	]	
Number of A-gradings	0	1	Achieved percentage:	1	
Number of B-gradings	0			1	
Number of C-gradings	0		missing or incorrect entries!		
Number of N.Agradings	0		not noosed		
Number of KO-gradings	0		not passed		
Total points	0			_	
Maximum achievable number of points	200				
Number of evaluated criteria	0				
Auditor's signature:			Business's signature:		

			Grading (please select with " x ")			" x ")		Corrective actions		
No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10	N.A.	not passed			
D 2	Requirements for Matrix Organisers				pts					
D 2.1	Standard Usage Agreement with VLOG				l					
D 2.1	Standard Osage Agreement with VLOG									
D 2.2.1	Matrix Description									
D 2.2.2	Site list									
D 2.2.3	Facility description of sites									
D 2.3	Contractual Binding of the Members	ко								
D 2.4	Risk Management	ко								
2.7	man management									

No. in Standard	Topic in Standard	А	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts		-10 pts	N.A.	not passed			
D 2.5	Commissioning External Service Providers								
D 2.6	Sampling and Testing								
D 2.6.1	Sampling and Testing Plan								
D 2.6.2	Sampling and Commissioning a laboratory								
D 2.6.3	Frequency of Sampling and Testing								
D 2.6.4	Evaluation of Test Results								
D 2.6.5	Evaluation of the analytical data								
D 2.7	Staff and Member Training								

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
D 2.8	Handling of Non-Compliant Feed, Raw Materials and Products	ко								
D 2.9	Complaint Management									
D 2.10	Goods Recall									
D 2.11	Crisis Management	ко								
D 2.12	Corrective Action, Ongoing Improvement Process									
D 2.13	Documentation and Retention Periods									
D 2.14	Internal Audit									

# VLOG Facility Description Agriculture Stage – Animal Production

**Version** 01.09.22

### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business. A separate facility description (Annex 20b) is available for beekeepers.

Name	e of business							
Facili	ty number/VVVO no.							
Address of the business/site (including country code)								
	act person & contact (e.g., telephone, e-mail ss)							
		☐ <b>I</b> ndivi	dual V	LOG certification	☐ Gi	☐ Group member		
Type VLOG	of VLOG certification/ G-ID	VLOG-ID	:			OG group member-ID  ( your group organiser)		
Organi	For small facilities (according to the VLOG Standard):							
	The following employees are involved Employees			unction, responsibility		Substitution		
Descr	Description of activities							
Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)			Portion VLOG (%) of the total production	produced annually VLOG		Starting date for "Ohne Gentechnik" feeding		
	☐ For others, see informal attachment							

# VLOG Facility Description Agriculture Stage – Animal Production

**Version** 01.09.22

### PART 2: ANIMAL INVENTORY, PURCHASE AND OUTSOURCING OF ANIMALS

Stab	le space over	view and animal inventory over	erview		0.
	A current "V	'LOG stable space overview" is	enclosed a	as an attachment.	Attachment: Stable space
	The busines	s has a current animal inventor	y overviev	ı.	·
Purch	nase of anima	ls for "Ohne Gentechnik" prod	duction		
	No animals h	nave been purchased since the	last VLOG	audit.	
	Animals have	e been purchased since the las	t VLOG aud	dit.	
		"Ohne Gentechnik"-compliant being credited: The attachme enclosed	_	by the previous owner is ase and outsourcing of animals" is	Attachment: Purchase and outsourcing of animals
		_	•	d was begun after the purchase of the npliant feeding by the previous owner	
		Poultry for meat production:	One-day o	hicks were purchased since the last V	LOG audit. <sup>1</sup>
Outso	ourcing of ani	mals in "Ohne Gentechnik" pr	roduction		
□ □ □ PAR1	minimum fe Animals hav	eding conversion period was be to be noutsourced since the late of	egun after ast VLOG a	udit (e.g., cattle: young cattle, gestati	,
Ow	n feed produ	ction			
	The busine	ss does not produce plant-base	ed feed.		
	permitted None of th presence o	in the country of cultivation.	ds or seed gs.	e is evidence that GMO cultivation is r lings used in feed production indicate Threshing crops	
		•		Other:n (e.g., Spain, Portugal). The business cultivation" is enclosed.	itself  ① Attachment: GMO cultivation
Pur	chase of feed		+ //  0.6 a	di+	
Ш		s been purchased since the las			
	Feed has b is enclosed		LOG audit:	The attachment "Purchase of feed"	<ul><li>Attachment:</li><li>Purchase of feed</li></ul>

<sup>&</sup>lt;sup>1</sup> The minimum feeding conversion period begins on the date of receipt into "Ohne Gentechnik" production (e.g., broilers) or conversion to "Ohne Gentechnik" feeding (e.g., turkeys). Animals that were slaughtered at least 10 weeks after stabling or feed conversion can be marketed as "Ohne Gentechnik" or "VLOG".

# VLOG Facility Description Agriculture Stage – Animal Production

**Version** 01.09.22

DADT	A. DICK	<b>ANALYSIS</b>	O DICK	DAARIA.	CENTENIT
PAKI	4: KISK	AINALYSIS	& KISK	IVIAIVA	GEIVIENI

Curr with  Ther interexte The "GM  PART 5: S  Pote qual Stan (If the organ (If the org	<ul> <li>entire business operates in accordance with the requirements for "Ohne Gentechnik" duction, i.e.:</li> <li>No GMO feed is produced, stored, processed or fed to animals.</li> <li>There is no inter-business use of machinery or outsourcing of activities to external providers when dealing with feed (except for cultivation and harvesting)<sup>2</sup>.</li> <li>rrently there are no further measures the business needs to take to preclude future con h or carryover of GMO-containing feed.</li> <li>ere are risks in the business affecting "Ohne Gentechnik" production (e.g., GMOs in the ler-business use of machinery for feed after harvesting, mobile grinding and mixing facilities.</li> </ul>						
Curr with  Ther interexter The "GN"  PART 5: S  Pote qual Stann (If the organ (If the	<ul> <li>There is no inter-business use of machinery or outsourcing of activities to external providers when dealing with feed (except for cultivation and harvesting)<sup>2</sup>.</li> <li>Trently there are no further measures the business needs to take to preclude future con h or carryover of GMO-containing feed.</li> <li>Ere are risks in the business affecting "Ohne Gentechnik" production (e.g., GMOs in the</li> </ul>						
with  Ther interexts The "GN"  PART 5: S  Pote qual Stan (If the organ (	h or carryover of GMO-containing feed. ere are risks in the business affecting "Ohne Gentechnik" production (e.g., GMOs in the	tammation					
interexted The The "GM"  PART 5: S  Pote qual Stann (If the Origan	· · · · · · · · · · · · · · · · · · ·						
PART 5: S  Pote qual Stan (If the organ (If	,						
PART 5: S  Pote qual Stan (If the Only The organ (If the Confeder)  According to the Only The Organ (If the Confeder)	external service providers).  The attachment "Risk analysis" or, for countries with GMO cultivation, the attachment						
□ Pote qual Stan (If the Only The organ (If the Only The Organ (If the Only The Onl	MO cultivation" is enclosed.						
qual Stan (If the Only The orga (If the	SAMPLING & GMO TESTING						
The orga (If the	entially risk-prone feed is only used in "Ohne Gentechnik" production if it is of "VLOG golity or a quality recognised as equivalent. Sampling and testing are not necessary under ndard.  The item applies, continue to Part 6)	•					
feed	y for VLOG group members: e agricultural business samples the risk-prone feed and retains any reference samples. Taniser organises and commissions the GMO testing of the feed or the reference sample the item applies, continue to Part 6)						
	cording to the VLOG Standard, the business must take samples (reference samples) and d used in "Ohne Gentechnik" production for GMOs because:	test the					
	Risk-prone feed is being used and/or						
		/LOG					
	There is a regular switch between "Ohne Gentechnik" feeding and GMO-feeding in a voperating unit and/or						
The	· · · · · · · · · · · · · · · · · · ·						

 $<sup>^{\</sup>rm 2}$  For example: Transport, drying, storage/relocation, crushing/grinding, mixing

# VLOG Facility Description Agriculture Stage – Animal Production

**Version** 01.09.22

### PART 6: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

Attachments also applicable to the facility description:

	Attachment Stable space overview (mandatory attachment)								
	Attachment Purchase and outsourcing of animals								
	Attachment Purchase of feed								
	Attachment Risk analysis								
	Attachment GMO cultivation								
	ousiness itself checks the facilit hereby declare the correctness			-to-date.					
Yea	r of examination	202	202	202					
Nan	ne								
Fun	ction								
(gra	category ding by the group organiser or r certification)								
Date	2								
Sign	ature								

### VLOG Facility Description Agriculture Attachment Stable space overview

	$^{\circ}$	$\sim$	~~
Version:	UI.	.09	.22

Name of business	VLOG-ID or VLOG group member-ID	

Please indicate ALL livestock raised in your agricultural operation.

Animal species/animal				Stable spaces	Unique stable designation,	
category (Select an item)	"Ohne Gentechnik"	Conventional - GMO-free	Conventional - with GMO	For poultry for fattening: production volume (kg/year)	site/VVVO No./ print number, if any	Remarks (indicate GMO feed, other)
Other:						

# VLOG Facility Description Agriculture Attachment Purchase and outsourcing of animals

Version: 01.	U9	.22
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	Ailliex 200		of an	imals	
Naı	me of business				
VLC	G-ID or VLOG group	member-ID			
PUR	CHASE OF ANIMAL	S FOR THE OHNE G	ENTECHNI	K PRODUCTION	
	mal category ect an item)	Number purchase last VLO		Previous owner (business + address)	Previous owner VLOG-certified/certified under equivalent standard
□ Pigs □	<ul> <li>Proof acco</li> <li>The piglets come fr can be credited tow</li> <li>Proof according</li> </ul>	attle and/or milk cov rding to the VLOG Sta om a VLOG-registere	ws in first la andard Ann d piglet pro eding conve dard Annex	ducer. "Ohne Gentechnik" feedi ersion period under the following	g conditions:
Othe	er species of animals	(except for laying he	ens and pou	Itry for fattening)	
	"Ohne Gentechnik" period under the fo	' feeding by the previ ollowing conditions: rding to the VLOG Sta	ous owner		•
OUT		MALS IN OHNE GEI			
		outsourced since the entechnik"-compliant		audit (e.g., cattle: young cattle,	gestating cows). Feeding
	Animal category (Select an item)	Number of animals outsourced calendar ye	per Busi	ness (name + address)	Previous owner VLOG- certified/certified under equivalent standard

Page	1	/1

## VLOG Facility Description Agriculture Attachment Purchase of Feed

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V	ersio	n: ເ	JI.	U9	.22

Name of business					VLOG-ID or VLOG group member-ID					_
			Certification status or grade of feed according to VLOG Standard E 4.2 (Please place an x next to only one feed)						Date of	_
<b>Exact description</b> of purchased feed/commercial name	Type of feed (Select an item)	Supplier (business & address)	VLOG/ recognised as equivalent	Not subject to compulsory labelling & not risk-prone	Not subject to compulsory labelling & risk- prone	ВМО	<b>Categorie</b> fed with ti		change (for additions/ deletions)	
							Other:			

## VLOG Facility Description Agriculture Attachment Risk Analysis

Nan	ne of business		
VLO	G-ID or VLOG group		
mer	nber-ID		
DIGI	44141VCIC Q DICK 444414	05145147 14474 0550567 70 745 005651465 05 01406	
KISK	ANALYSIS & RISK MANA	AGEMENT WITH RESPECT TO THE PRESENCE OF GMOS	
For b	usinesses in EU countries in	n which GMO cultivation is not permitted, and no GMOs are released.	
Risk a	analysis for feed handling		
	,		
The	following risks for "Ohne G	Sentechnik" production were identified in the business:	
	(Temporary) production, s	storage, processing or feeding of GMO feed	
	Explanation: (category of	f animal, GMO feed, extent, duration):	
	Regular switching betwee	n feeding with "Ohne Gentechnik" feed and with GMO feed	
	Explanation: (category of	f animal, GMO feed, extent, date of changeover):	
	Utilisation of dual-use stat	tionary grinding and mixing facilities	
		f animal, GMO feed, frequency of use):	

Cross-business use of machinery or use of external service providers when handling feed (see p. 3)

## VLOG Facility Description Agriculture Attachment Risk Analysis

**Version:** 01.09.22

The following measures to avoid future contamination and carryover of GMO feed were derived based on the risks identified:

Please describe the precise measures taken and add blueprints of storage facilities for GMO feed, feed manufacturing and handling facilities (mixing facilities, storage of equipment, feeding facilities, transport routes) as well as barns incl. animal species.

Testing of the flow of goods for <b>risk</b> of the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling	Measures established to avoid contamination and carryover
during delivery and filling (e.g., of silos, tanks)	
during storage	
during mixing	
during handling & feeding (feed waggon, means of transport, etc.)	
Other factors in the business (that could lead to the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling)	

## VLOG Facility Description Agriculture Attachment Risk Analysis

**Version:** 01.09.22

#### Risk analysis external service providers

Please indicate here all businesses that perform services for "Ohne Gentechnik" production involving the handling of feed after harvesting (e.g., transport, drying, storage/relocation, crushing/grinding, mixing). Please also record which measures have been taken in order to prevent carryover or commingling.

3,	ing, grinding, mixing). Flease diso		Certification status of the service provider			3 3
Type of service	Explanation	Business (name + address)	VLOG-certified/ certified under equivalent standard	QS-certified	Other/no certification	<b>Measures</b> established to avoid contamination and carryover, if any
Mobile grinding/mixing facility						
Joint use of machinery - machinery ring						
Joint use of machinery /equipment – neighbourhood assistance						
Others:						

## VLOG Facility Description Agriculture Attachment GMO cultivation

Version:	01.	09	.22
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Name of business	
VLOG-ID or VLOG group member-ID	
RISK ANALYSIS & RISK MAN	NAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS
For businesses in EU countries permitted or <del>probable</del> known	in which GMO cultivation or the release of GMOs for research purposes is change
The following risks for "Ohne (	Gentechnik" production were identified in the business:
Risk analysis own feed produc	ction
• •	ials for one's own "Ohne Gentechnik" feed production are verifiably not subject to y way of declarations on seed or planting material receipts, labels).
☐ Staple/green fee	d
☐ Root crops	□ Other:
a radius of 10 km of one	I location register or other information, GMO plants are cultivated or released within e's own business premises.  Eed by the business itself.
(own or third-party GN	MO cultivation or release)
"Ohne Gentechnik" fe same crop in the busir	$\cdot$
·	ne business's feed crop
Risk analysis for feed handling	g
	of animal, GMO feed, extent, duration)
•	een feeding with "Ohne Gentechnik" feed and with GMO feed of animal, GMO feed, extent, date of changeover)
	tationary grinding and mixing facilities of animal, GMO feed, frequency of use)
Cross-business use of m	nachinery or use of external service providers when handling feed (see p. 3)

The following measures to avoid future contamination with and carryover of GMO feed were derived based on the risks identified:

## VLOG Facility Description Agriculture Attachment GMO cultivation

**Version:** 01.09.22

Please describe the precise measures taken and add blueprints of storage facilities for GMO feed, feed manufacturing and handling facilities (mixing facilities, storage of equipment, feeding facilities, transport routes) as well as barns incl. animal species.

Testing of the flow of goods for risk of the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling	Measures established to avoid contamination and carryover
Feed production in the business	
during delivery of seeds	
during storage of seeds	
during seeding	
during plant care (e.g., carryover during fertilisation or crop protection)	
during harvesting	
Feed handling in the business	
during delivery and filling (e.g., of silos, tanks)	
during storage	
during mixing	
during handling & feeding (feed waggon, means of transport, etc.)	
Other factors in the business (that could lead to the presence, carryover, admixture and/or swapping of feed subject to compulsory labelling)	

### VLOG Facility Description Agriculture Attachment GMO Cultivation

Version: 01.09.22

#### Risk analysis external service providers

Please indicate here all businesses that perform services for "Ohne Gentechnik" production involving the production and handling of feed. Please also record which measures have been taken in order to prevent carryover or commingling.

	to prevent carryover or comminging		Certification status of the service provider			
Type of service	Explanation	Business (name + address)	VLOG- certified/ certified under equivalent	QS-certified	Other/no certification	<b>Measures</b> established to avoid contamination and carryover, if any
Mobile grinding/mixing facility						
Joint use of machinery - machinery ring						
Joint use of machinery /equipment – neighbourhood assistance						
Desiccation facility						
Others:						

## VLOG Beekeeper's Facility Description and Declaration (honey/bees)

**Version** 01.09.21

### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers applicable to your business.

Name	e of the business						
Regis	tration number/VVVO N	lo.					
	ess of the business/site ling country code)						
	act person & contact da hone, e-mail address)	ta (e.g.,					
VLOG	G-ID:						
Organ	izational chart						
	There is an updated or	ganisatio	nal chart for the	agricultural busir	ness.		
	For small facilities (according to the VLOG Standard):  The following employees are involved in "Ohne Gentechnik" production:						
	Employees* (Family members/external employees)		Function, responsibility		Substitution		
Descri	ption of activities				•		
Areas	s of application of certification	Number bee colo	of managed Portion (%) poiles total produ			Volume of honey produced annually (kg)	
Beek	Beekeeping – honey/bees						
PART	2: PURCHASE OF ANII	MALS					
Are co	lonies purchased in cou No	ntries oth	er than Germany	?			

## VLOG Beekeeper's Facility Description and Declaration (honey/bees)

**Version** 01.09.21

#### **PART 3: SITE OVERVIEW**

The site overview for the bee colonies is up to date. The records shall be preserved for at least three (3) years.							
All nectar, breeding and wintering sites are located in Germany (continued in Part 4).							
There a	re nectar, breeding and wintering sites outside of Germany.						
	According to official location registers or other information, <u>no</u> GMO plants are cultivated or released within a radius of 10 km from individual bee sites.  According to official location registers or other information, GMO plants are cultivated or released within a radius of 10 km from individual bee sites.  GMO plants are cultivated by the business itself.						
	GMO crop(s) cultivated or released:						
	Shortest distance to the bee sites:						

#### **PART 4: FEED**

Please list all the bee feeds available at the business. Please always keep this overview updated by listing newly added feeds/suppliers and removing those no longer used. After the initial assessment, in case of additions/deletions, always indicate the date as of which the feed was added or is no longer used (change date). Proof is available that the purchased feed is not subject to compulsory labelling.

Exact designation of the feed	Purchased from (supplier and address)	Amendment date

### **VLOG Beekeeper's Facility Description and Declaration (honey/bees)**

**Version** 01.09.21

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1: FEED LIST							
a limited time (continue) The following genetic	<i>led in Part 5).</i> Cally modified feed is manufa	-					en for
Exact designation of	the feed	Animal spec	es / Anim	al cat	egory		
modified feed with fe	eed for the bees.	yover, comminį	gling and s	swapp	oing of	genet	ically-
		REDIENTS					
Designation of honey	Supplier (name + address)	h pur	oney chased	١	/LOG o	ertifie	ed?
					Yes		No
					Yes		No
					Yes		No
					Yes		No
Other ingredients (e.	g., herbs, spices) purchased s	ince the last VL	OG audit:				
			Date	of GM	O-free	certif	ficate
Ingredient	Supplier (name + a	address)	(Annex		ne VLO	G Sta	ndard)
Ingredient	Supplier (name + a	address)			ne VLO	G Sta	ndard)
Ingredient	Supplier (name + a	address)			ne VLO	G Sta	ndard)
Ingredient	Supplier (name + a	address)			ne VLO	G Sta	ndard)
	NO genetically modified a limited time (continual The following genetic premises, even for a Exact designation of Exact designation of Exact designation of (E.g. upon delivery, see Exact designation of Honey purchased since Designation of honey  Other ingredients (e.g. Other ingredients (e.g. designation) of honey	NO genetically modified feed is manufactured, stora limited time (continued in Part 5).  The following genetically modified feed is manufapremises, even for a limited time.  Exact designation of the feed  The following measures are taken to prevent carry modified feed with feed for the bees.  (E.g. upon delivery, storage):  5: ACQUISITION OF HONEY & ADDITIONAL INGINATIONAL ING	NO genetically modified feed is manufactured, stored, processed a limited time (continued in Part 5).  The following genetically modified feed is manufactured, stored, premises, even for a limited time.  Exact designation of the feed  Animal special Animal spec	NO genetically modified feed is manufactured, stored, processed or fed on a limited time (continued in Part 5).  The following genetically modified feed is manufactured, stored, processed premises, even for a limited time.  Exact designation of the feed Animal species / Animal	NO genetically modified feed is manufactured, stored, processed or fed on the palimited time (continued in Part 5).  The following genetically modified feed is manufactured, stored, processed or fed premises, even for a limited time.  Exact designation of the feed  Animal species / Animal cat  The following measures are taken to prevent carryover, commingling and swapp modified feed with feed for the bees.  (E.g. upon delivery, storage):  5: ACQUISITION OF HONEY & ADDITIONAL INGREDIENTS  Honey purchased since the last VLOG audit:  Designation of Supplier honey purchased (kg/year)  (kg/year)  Other ingredients (e.g., herbs, spices) purchased since the last VLOG audit:	NO genetically modified feed is manufactured, stored, processed or fed on the premise a limited time (continued in Part S).  The following genetically modified feed is manufactured, stored, processed or fed on the premises, even for a limited time.  Exact designation of the feed  Animal species / Animal category  The following measures are taken to prevent carryover, commingling and swapping of modified feed with feed for the bees. (E.g. upon delivery, storage):  5: ACQUISITION OF HONEY & ADDITIONAL INGREDIENTS  Honey purchased since the last VLOG audit:  Designation of Supplier honey purchased (kg/year)  VLOG of honey (name + address)  yes  Yes  Other ingredients (e.g., herbs, spices) purchased since the last VLOG audit:	NO genetically modified feed is manufactured, stored, processed or fed on the premises, eva a limited time (continued in Part 5).  The following genetically modified feed is manufactured, stored, processed or fed on the premises, even for a limited time.  Exact designation of the feed  Animal species / Animal category  The following measures are taken to prevent carryover, commingling and swapping of genet modified feed with feed for the bees.  (E.g. upon delivery, storage):  5: ACQUISITION OF HONEY & ADDITIONAL INGREDIENTS  Honey purchased since the last VLOG audit:  Designation of Supplier Quantity of honey purchased (kg/year)  VLOG certifier (name + address)  WLOG certifier (kg/year)  Other ingredients (e.g., herbs, spices) purchased since the last VLOG audit:

## VLOG Beekeeper's Facility Description and Declaration (honey/bees)

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#### **PART 6: OTHER RISKS OR SUSPICIOUS FACTS**

In the event of additional identified risks or even the smallest suspicion of contamination from pollen or other parts of genetically-modified plants, the business takes all necessary operational measures to exclude this possibility.

Suspicious facts, identified risks	Measures established to avoid contamination, carryover and swapping

#### PART 7: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. I/we hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Risk category (grading by prior certification)			
As of (date)			
Signature			

### VLOG Facility Description Agriculture Stage – Animal Transport/Livestock Trade

**Version:** 01.09.22

#### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business.

	<u> </u>				
Name of business					
Facility number/VVVO no.					
Address of the business/site (including country code)					
Contact person & contact data (e.g., telephone, e-mail address)					
	☐ Individ	ual VLOG co	ertification		Group member
Type of VLOG certification/ VLOG-ID	ation/ VLOG-ID:				OG group member-ID your group organiser)
Organizational chart  There is an updated or  For small facilities (accomplete the following employed)	cording to th	ne VLOG Sta	andard):		
Employees		Function,	responsibility		Substitution provision
Description of activities					
Activity area in the VLOG production		Portion VLOG (% of the total production	6)	Number of animals transported or traded annually VLOG (kg, t or units)	
☐ Animal transport			•		,
☐ Livestock trade					

### VLOG Facility Description Agriculture Stage – Animal Transport/Livestock Trade

**Version** 01.09.22

### **PART 2: ANIMAL TRANSPORT, SUPPLIERS**

The attachment on "Risk analysis" is enclosed.

Anim	nal Transport Overview	0
	The current animal transport overview is enclosed as an attachment.	Attachment: Animal transport overview
List c	of suppliers for "Ohne Gentechnik" production	
	The current overview of suppliers of VLOG animals is on file.	O Attachment: List of suppliers
PART	3: RATIONS & FEED	
Feed		
	Transported/traded VLOG animals are not fed	
	Transported/traded VLOG animals are fed	
	$\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ $	
	Purchase of feed since the last VLOG audit: The attachment on "Purchase of feed" is enclosed.	Attachmen  Purchase of fee
PART	4: RISK ANALYSIS & RISK MANAGEMENT	
	The entire business operates in accordance with the requirements for "Ohne Gentechnik" production, i.e.:	
	<ul> <li>There is no GMO feed in the business.</li> </ul>	
	<ul> <li>There is no feeding during transport.</li> <li>There is no interim stabling/handling during transport of the VLOG animals from the to the customer.</li> </ul>	ne supplier
	Currently there are no further measures the business needs to take to preclude future con with or carryover of GMO-containing feed.	tamination
	The business has risks affecting "Ohne Gentechnik" production (e.g., GMOs in the business stabling)	
		Attachment:

Risk Analysis

### **VLOG Facility Description** Agriculture Stage – Animal **Transport/Livestock Trade**

**Version** 01.09.22

#### **PART 5: SAMPLING & GMO TESTING**

	The transported/traded VLOG animals are not fed. No sampling and testing is needed. (If the item applies, continue to Part 6)					
	The	transported/traded VLOG animals are fed.				
		Potentially risk-prone feed is only used in "Ohne Gentechnik" production if it is of "VLOG				
		geprüft" quality or a quality recognised as equivalent. Sampling and testing are not necessary				
		under the VLOG Standard.				
		(If the item applies, continue to Part 6)				
		Potentially risk-prone feed is used for VLOG animals. According to the VLOG Standard, the				
		business must take samples (reference samples) and test the feed used in "Ohne Gentechnik"				
		production for GMOs. The business has a written sampling and testing plan.				
PAR	T 6: 5	SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION				

Attacl	hment	ts also	o app	licab	le to	the	facility	description	n:

Attachment Animal inventory overview
Attachment List of suppliers
Attachment Purchase of feed
Attachment Risk analysis

The business itself checks the facility description once each calendar year, and it is up-to-date. I/we hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Risk category (grading by the group organiser or prior certification)			
Date			
Signature			

### VLOG Facility Description Animal Transport/Livestock Trade Attachment Animal transport overview

Version:	01	.09	.22
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Name of business VLOG-ID or VLOG group member-ID	
--	--

Please enter all animals or categories of animal traded / transported by your business.

	VLC	OG animals	Α	nimals of other qu	ıality	Remarks
Animal species/animal category (Select an item)	Transport/ carriage	Feeding of animals during transport/carriage	Transport/carriage	Feeding of animals Only feed not subject to compulsory labelling	Also feed subject to compulsory labelling	(interim stabling/handling, indicating GMO feed, other)
		$\boxtimes$				
Other:						

## VLOG Facility Description Agriculture Attachment List of suppliers

<b>Version:</b>	Λ1	$\cap \Omega$	22
version:	UΙ	.U7	.∠∠

Name of business	VLOG-ID or VLOG group member-ID	

Please enter here ALL suppliers of "VLOG" animals that are relevant in your business.

Name of business	"VLOG" animals/animal categories transported/traded (Select an item)	VLOG certification/certification recognised as equivalent exists	Date of change (in case of additions/deletions)
	Other:		

## VLOG Facility Description Animal Transport/Livestock Trade Attachment Purchase of Feed

١	<b>/</b> _	rci	i	n٠	01	ľ	9	.22
١,			•			L.\.		

Name of business				VLOG-ID or VLOG group member-ID					
			according	on status o to VLOG St e an x next to	andard E 4.	2			
Exact description of purchased feed/commercial name	Type of feed (Select an item)	Supplier (business & address)	VLOG/ recognised as equivalent	Not subject to compulsory labelling & not risk-prone	Not subject to compulsory labelling & risk- prone	ВМО	Categorie fed with t (Select an it	Date of change (for additions/ deletions)	
			П	П	П	П	Other:		

### VLOG Facility Description Animal Transport/Livestock Trade Attachment Risk analysis

Versi		Λ1	$\Omega$	22
versi	on:	UI.	UY.	.//

Nar	ne of business	
VLC	G-ID/ VLOG group member-ID	
RISK	ANALYSIS & RISK MANAGEM	ENT WITH RESPECT TO THE PRESENCE OF GMOS
Risk	analysis for feed handling	
The	(Temporary) presence of GMO f	hnik" production were identified in the business: eed al, GMO feed, extent, duration):
	Interim stabling/handling of VLC Explanation (duration, feeding	
	•	G" animals and animals of a different quality in a single means of r mixed interim stabling at a stopover.
	Feeding of animals during trar Explanation (feed):	isport or interim stabling

### VLOG Facility Description Animal Transport/Livestock Trade Attachment Risk analysis

Version: 01.09.22

The following measures to avoid future contamination and carryover of GMO feed/swapping of animals of different quality were derived from the risks identified:

Please describe the precise measures taken and add blueprints of storage facilities for GMO feed, feed manufacturing and handling facilities (mixing facilities, storage of equipment, feeding facilities, transport routes) as well as barns incl. animal species.

Testing of the flow of goods for <b>risk</b> of entry, carryover, admixture and/or swapping	<b>Measures</b> established to avoid contamination, carryover and swapping
during delivery and filling (e.g., of silos, tanks)	
during storage	
during mixing	
during handling & feeding (feed waggon, means of transport, etc.)	
during transport/interim stabling of animals	
Other factors in the business (that could lead to entry, carryover, admixture and/or swapping)	

Business:			
Identification number if available:			
VLOG-ID (10-xxxxx) or Group organiser:			
Audit participant business:			
Sites that have been audited			
(incl. adress):			
Scope of certification:			
Business risk grading			
(transferred from facility description):	Auditor:	Correction Evaluator:	
		<u> </u>	•
Grading			
Graung			

(transferred from facility description):	Auditor:	Correction Evaluator:	place?
Grading			Audit result
Number of A-gradings	0		Achieved percentage:
Number of B-gradings	0		missing or incorrect outries!
Number of C-gradings	0		missing or incorrect entries!
Number of N.Agradings	0		not nooned
Number of KO-gradings	0		not passed
Total points	0		•
Maximum achievable number of points	340		

□yes	□no
□yes	□no
□yes	□ no
	□ yes

Audit result
Achieved percentage:
missing or incorrect entries!
not passed

Business's signature:

Number of evaluated criteria

Auditor's signature:

			Gradin	g (plea	se sele	ct with	" x ")		Correct	Corrective actions			
No. in	Topic in Standard			В		N.A.	ко	Evaluation/Explanation	Corrective action (business)	Corrective action (business) Responsibility/			
Standard										dates/status (business)			
			10 pts	5 pts	-10	N.A.	not						
					pts		passed						
E 3	General Requirements												
E 3.1	Standard Usage Agreement with VLOG												
500	5 1111 5 1 11												
E 3.2	Facility Description												
E 3.3	Assignment of Responsibilities,												
	Organisational Chart												
E 3.4	Risk management												
€ 3.4	Risk management												
E 3.5	Commissioning External Service												
	Providers, Joint Use of Machines and												
	Facilities												
E 3.6	Handling of Non-compliant Feed,	ко											
2 3.0	Products and Animals	N.O											

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts		not passed			, , , , , , , , , , , , , , , , , , , ,
E 3.7	Traceability	ко								
E 3.8	Complaint Management									
E 3.9	Crisis Management	ко								
E 3.10	Corrective Action									
E 3.11	Documentation and Retention Periods									
	Staff Training									
E 3.13	Self-monitoring									

No. in Standard	Topic in Standard			ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	-10 pts	not			
E 4	Specific Requirements for Animal Productio	n	pts	passed			
E 4.1	Animal Inventory						
E 4.2	Risk-prone Feed						
E 4.3	Feed Ordering						
E 4.4	Feed List						
E 4.5	Feed Rations						
E 4.6	Incoming Goods Inspection of Feed KC						

No. in	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/
Standard										dates/status (business)
			10 pts	5 pts	-10	N.A.	not			
					pts		passed			
E 4.7	Compliance with the Minimum Feeding	ко								
	Conversion Period									

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Responsibility/ dates/status (business)
			10 pts		-10 pts		not passed		
E 4.8	Purchase of animals	ко							
E 4.9	Segregation of Goods Flows, Exclusion of Contamination	ко							
E 4.10								ess, all points	
							ge is relevar	nt, KO criteria	
E 4.10.1	Continuation of System Purges	may i	not be g	graded	as N.A.				
E 4.10.2	Joint Use of Mobile Grinding and/or Mixing Facilities								
E 4.10.3	Use of Stationary Grinding and Mixing Facilities								

No. in Standard	Topic in Standard	A	В		С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10	ots 5		-10 pts	N.A.	not passed			
E 4.11	Sampling and Testing	If this sul	o-sta	ge is n	ot rele	vant fo	r the busine	ess, all points		
								nt, KO criteria		
		may not					•	,		
E 4.11.1	Sampling and Testing Plan		1			1				
L 4.11.1	Sampling and resulig rian									
E 4.11.2	Sampling, Retention of Reference									
	Samples									
E 4.11.3	Commissioning a Laboratory									
	,									
E 4.11.4	Frequency of Testing									
E 4.11.5	Evaluation of Test Results									
E 4.11.6	Reduction of the Scope of Testing after									
	Changing Feed in Group Organisations									
			_			1				

No. in	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/
Standard									dates/status (business)
		10 pt	5 pts	-10	N.A.	not			
				pts		passed			
E 4.12	Outgoing Goods Inspection, Labelling on								
	Bills of Lading								
E 5	Specific Requirements for Plant-based If	this sub-	tage is	not rele					
	Feed Manufacturing	re graded	as N.A	. If the s	sub-sta	ge is relevar	nt, KO criteria		
	m	ay not be	graded	as N.A					
E 5.1	Incoming Goods Inspection of seeds and K	0							
	seed stock								
E 5.2	Segregation of Goods Flows/Exclusion of K	0							
	Contamination								

### VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Sub-stage E\_Livetock Trade & Animal Transport

V23.01

Business:		
Identification number if available:		
VLOG-ID (10-xxxxx) or Group organiser:		
Audit participant business:		
Sites that have been audited (incl. adress):		
Scope of certification:		
Business risk grading		
(transferred from facility description):	Auditor:	Correction Evaluator:
	-	

Date of audit:		
Duration of audit (time from - to):		
Auditor:		
Responsible certification body:		
Combination with other standard(s):		
Focus of facility inspection:		
Sampling during audit:	□ yes	□no
Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□no
Is there a Licence Agreement with VLOG in place?	□ yes	□no

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	170
Number of evaluated criteria	0

Audit result
Achieved percentage:
missing or incorrect entries!
not passed

Auditor's signature:	
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Business's signature:

		Gra	ding (p	lease	select	with	" x ")		Corre	ective actions
No. in Standard	Topic in Standard	А	В	С	N.A.	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10	ots 5 p	ts -1			not passed			
E 3	General Requirements								·	
E 3.1	Standard Usage Agreement with VLOG									
E 3.2	Facility Description									
E 3.3	Assignment of Responsibilities, Organisational Chart									
E 3.4	Risk management									
E 3.5	Commissioning External Service Providers, Joint Use of Machines and Facilities									
E 3.6	Handling of Non-compliant Feed, Products and Animals	ко								

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
E 3.7	Traceability	КО								
E 3.8	Complaint Management									
E 3.9	Crisis Management	ко								
E 3.10	Corrective Action									
E 3.11	Documentation and Retention Periods									
E 3.12	Staff Training									
E 3.13	Self-monitoring									

No. in	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/			
Standard	·						, .	, ,	dates/status (business)			
		10 pt	5 pts			not						
				pts		passed						
E 6	Specific Requirements for Animal Transport, Livestock Trade											
E 6.1	Animal Transport Overview											
E 6.2	Incoming Goods Inspection of Animals K	D										
E 6.3	Segregation of Goods Flows, Exclusion of Co	ntaminati	ons and	Swappi	ng							
E 6.3.1	VLOG animals Kr	0										
E 6.3.2	Feeding of Animals Ko	0										

VLOG Standard Annex 23

## VLOG Group Description in Agriculture and Members List

Version 01.01.2022

The following is a sample template for a group description. A group description must be submitted to the certification body at the time of the application. The group organiser must notify the certification body of any major changes pertaining to VLOG certification.

### Group description of sample group "SaGro GmbH"

Group organiser:

SaGro GmbH

Sample street 12, 54321 Sample town

Responsible for group certification:

Sam Sample (QM officer of Sample GmbH)

Phone: 0123 4567 89 Email: s.sample@samplegmbh.com

Activities of group members:

Sample text: The members of the SaGro VLOG group are agricultural operations that keep dairy cows and produce raw milk that complies with the requirements of the VLOG Standard [...]. The agricultural operations refrigerate the milk, but do not treat it otherwise. The milk is sold directly to SaGro GmbH. Some smaller quantities of milk are also sold directly from the farm to consumers [...].

The agricultural operations are mainly located in the administrative districts/federal states/countries [...].

Some operations are also engaged in other agricultural activities such as cattle and pig fattening or egg production [...]; however, these activities are not part of the SaGro VLOG group.

Contractors, subcontractors and outsourced processes:

The following contractors are included in the SaGro group:

• Transpofix GmbH, Feedstreet 8, 12345 Sampleville

Contact person:

Contact information:

Transpofix GmbH transports the raw milk from members to the dairy plant [...] on behalf of SaGro GmbH. It takes samples, records milk quantities [...]

[...]

Areas of responsibility of the group organiser:

Sample text: SaGro prepares and monitors the [...] group's sampling and test plan. It commissions the sampling within the scope of the VLOG audit by the certification body [...]

SaGro arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective actions together with the affected businesses [...].

VLOG Standard Annex 23

## VLOG Group Description in Agriculture and Members List

Version 01.01.2022

SaGro assumes the risk management for the milk production sector and maintains a crisis management system that involves the group members [...].

SaGro GmbH carries out an internal audit of the agricultural operations annually.

[...]

Basis for initial and subsequent certifications

Sample text: The group operates according to the 25% method: 100% of the members are audited by the group organiser; after that, the certification body audits a minimum of 25% of the members. In subsequent years, the audits by the certification body will take place based on risk grading.

Or:

The group operates according to the 100% method: 100% of the members are audited by the certification body before they can be added to the group. In subsequent years, the audits by the certification body will take place based on risk grading.

Use of multiple certification bodies

[If multiple certification bodies are used, the group description must clearly indicate which tasks are to be performed by which certification body.]

Sample text: Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaGro group.

A-cert audits the group organiser and the following part of the group [list the agricultural operations, the region or another reference list such as the members list].

Auditing by B-cert [see list above]. Auditing by C-cert [see list above].

B-cert and C-cert must share their audit results with A-cert, which will then issue the VLOG certificate to the group. The certification bodies have entered into a data sharing agreement.

VLOG Standard Annex 23

## VLOG Group Description in Agriculture and Members List

Version 01.01.2022

Examples of filled-out members lists for group certification in agriculture (Annex 23a) and group certification in agriculture with laying hens (Annex 23b) can be found below. The members list must always be kept up to date by the group organiser. The group organiser has to immediately notify the certification body of any relevant changes. The Excel template, which is available on the VLOG website, must always be used to exchange data with the certification body (entire list or area marked in blue) and to transfer data to VLOG (area marked in green).

Sample members list (Annex 23a) - Part 1/2

Data exchange l	oetween the gro	oup organiser	and certification	body.					
									Continued in Part 2/2 (see below)
VLOG Member	rs List								[]
									[]
Group member business name	Country code + postal code, if any	Site	Street and house number	Contact person	Email	Telephone	VVVO No. /official approval no.	Date of initial data collection by GO	[]
Hans Müller	BB 12345	Feldkirchen	Feldweg 2	Hans Müller	hmueller@anbi eter.de	0123 45675	123 04 567 089 xxxx	14.04.19	[]
Milchhof Max	BW 98765	Milchbach	Am Milchhof 1	Max Bauer	milchhof@anbie ter.de	0987 56765	987 06 543 021 xxxx	03.07.20	[]
[]									[]

Sample members list (Annex 23a) - Part 2/2

Data exchange between the group organiser and certification bodies.									
Continued from Part 1/2 (see above)	Data transfer 1x per calendar year to VLOG (Time period: 1st quarter; via E-mail to: <a href="mailto:qualitaet@ohnegentechnik.org">qualitaet@ohnegentechnik.org</a> )								
	Operation (group organiser):							VLOG-ID:	As of:
[]	Group member-ID	Postal code (123xx)	Areas of applicability	Risk categor y	Audit date (initial audit/ routine audit)	Audit result (%)	VLOG group entry date	VLOG group exit date	VLOG certification body
[]	10-12345-123	123xx	Cattle – cow's milk (raw)	0	23.05.2020	100	03.06.19		Name of cert. body
[]	10-12345-987	987xx	Cattle – cow's milk (raw)	2	Has not yet taken place	100	05.07.20		Name of cert. body
[]									

# VLOG Group Description in Agriculture and Members List

Version 01.01.2022

Sample members list for laying hens/eggs (Annex 23b) – Part 1/2

Data exchange I	oetween the gro	oup organiser	and certification	bodies.					
VLOG Members List – Laying hens/Eggs									
								_	[]
Group member business name	Country code + postal code, if any	Site	Street and house number	Contact person	Email	Telephone	VVVO No. /official approval no.	Date of initial data collection by GO	[]
Hans Müller	BB 12345	Feldkirchen	Feldweg 2	Hans Müller	hmueller@anbi eter.de	0123 45675	123 04 567 089 xxxx	14.04.19	[]
Milchhof Max	BW 98765	Milchbach	Am Milchhof 1	Max Bauer	milchhof@anbie ter.de	0987 5676	987 06 543 021 xxxx	03.07.20	[]
[]									[]

Sample members list for laying hens/eggs (Annex 23b) – Part 2/2

Data exchange bet	ween the grou	p organiser and o	certificatio	on body								
	Data transfer 1x per calendar year to VLOG (Time period: 1st quarter; via E-mail to: <a href="mailto:qualitaet@ohnegentechnik.org">qualitaet@ohnegentechnik.org</a> )											
Continued from Part 1/2 (see above)	Operation (gro	VLOG-ID:	As of:									
172 (300 40010)												
[]	Egg producer: print number(s)	Group member-ID	Postal code (123xx)	Areas of applicability	Risk categor y	Audit date (initial audit/ routine audit)	Audit result (%)	VLOG group entry date	VLOG group exit date	VLOG certification body		
[]	1-DE-1234567	10-12345-123	123xx	Cattle – cow's milk (raw)	0	23.05.2020	100	03.06.19		Name of cert. body		
[]		10-12345-987	987xx	Cattle – cow's milk (raw)	2	Has not yet taken place	100	05.07.20		Name of cert. body		
[]												

Data exchange betwe	en the group or	ganiser and o	ertification b	ody													
									Data transfer 1x per calen	dar year to V	'LOG (Time per	iod: 1st qu	ıarter; via E-ma	il to: qualitaet	@ohnegentech	nik.org)	
VLOG Members	List								Business (Gruppenorganis	sator):						VLOG-ID:	As of:
								1		1	1		1	1			
Group members	Country code + postal code,		Street +			Tele-	VVVO-No./ Official Approval	Date of inital data collection		Postal code	Area of	Risk-	Auditdate (initial audit/	Audit result	VLOG-group	VLOG-group	VLOG-
Business name	if amy	Site	house No.	Contact person	Email	phone	No.	by GO	Group member-ID*	(123xx)		category	routine audit)	in %	entry date	exit date	certification body
		<u> </u>															

	Data exchange betwe	en the group or	ganiser and o	ertification b	odies.														
Country code Group members + postal code, Street + Tele- Official data collection Egg producer: Postal code Area of Risk- ((initial audit/ Audit result VLOG-group VLOG-group certification										Data transfer 1x p	er calendar year to VLO	G (Time perio	d: 1st quarter; v	ia E-mail t	o: qualitaet@oh	negentechnik.or	g)		
Country code Group members + postal code, Street + Tele- Official data collection Egg producer: Postal code Area of Risk- ((initial audit/ Audit result VLOG-group VLOG-group certification	VLOG Members	List - Laving	hens/eaa	S						Business (Gruppe	enorganisator):							VLOG-ID:	As of:
Group members + postal code,   Street +   Tele- Official data collection   Egg producer:   Postal code   Area of   Risk-   (initial audit/   Audit result   VLOG-group   VLOG-group   certification																			
	Group members Business name	+ postal code,	Site		Contact person	Email		Official	data collection	Egg producer: Print number(s)	Group member-ID				(initial audit/	Audit result in %	VLOG-group entry date	VLOG-group	certification
																		<b>_</b>	
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		1																<u> </u>	
		+																<del>                                     </del>	

## VLOG Group Description in Agriculture - Transmission of Stable Spaces Cattle/Ruminants -

## Anonymised transmission of stable spaces (1x per calendar year to VLOG, time period: 1st quarter; via E-mail to: qualitaet@ohnegentechnik.org) Please use one line for each business! Only for the animal category within the scope of application of your group certification Cattle fattening Bull/Oxen fattening, Business (group organiser): VLOG-ID: As of (date): Calf fattening (young cattle, heifers) including young bulls Sheep Goats Dairy cows\* Heifers Calves Stable spaces \*\*

<sup>\*</sup> For the first report in 2023, the number can be calculated based on the milk yield of the business and the average yield per dairy cow this one time.

<sup>\*\*</sup>If animals are pasture-fed, please indicate the equivalent number of animals

## VLOG Group Description in Agriculture

		- Trai	nsmission of S	table Spaces I	Pigs -		
Į.	Anonymised only		e use one line for e	ach business!		animals	
Business (group organiser):	VLOG-ID:	As of (date):	Piglet rearing	Pig fattening	Gilts	Sow keeping	Boar rearing
			Animals pro	duced per year		Stable spaces	3

# VLOG Group Description in Agriculture - Transmission of Stable Spaces Poultry -

		- Transm	ission of Stable	Spaces Poul	ltry -						
	Anon	ymised transmiss Plea Only for the species o	se use one line for e	ach business!		nals					
Business (group organiser):	VLOG-ID:	As of (date): Laying hens Pullet rearing Chicken fattening Turkey Goose fattening fattening									
			Stable spaces		Productio	n volume/year	in kg				
							<u> </u>				
							<u> </u>				
							<u> </u>				
			-				<del></del>				
			I		Ī		•	4			

# VLOG Group Description in Agriculture - Transmission of Test Results -

Λ	100	4.0		C I	11 4	/c I\
Anony	/misea	transmis	รรเกท	OT TAST	results	TEEUI
7 (I I O I I )	IIIIJCA	ti ui ioi ii.	551011	OI LOST	I COUITO	(ICCG)

(1x per calendar year to VLOG, time period: 1st quarter; via E-mail to: qualitaet@ohnegentechnik.org)

Operation (group organiser):	
VLOG-ID:	
As of (date):	

## Analysis of the number of test results from previous calendar year

Number of GMO tests performed according to the VLOG Standard in previous calendar year
Of which, permissible for VLOG production / not subject to compulsory labelling
Of which, impermissible for VLOG production / subject to compulsory labelling

List of test results for feed graded as impermissible (GMO %, totalled per plant species):

	Soy	Corn/maize	Rapeseed/ Canola	Sampling date	Notes
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					
% GMO					

## VLOG Standard Annex 23e

### Template Data Release Statement

Version 01.09.21

Name, first name of the data subject (farmer):

Address of the agricultural business:

Declaration of consent for the processing of personal data in accordance with the GDPR I consent to the transfer of the following personal data:

- name, first name (if included in the business name)
- address, email address, telephone number
- scope of applicability of the certification
- risk category
- audit date and results
- start and end date of the membership in the VLOG group
- identification number
- VVVO number
- print number
- stable space overview
- evaluation and overview of the test results

from (group organiser):

and the relevant certification body:

to Verband Lebensmittel Ohne Gentechnik e.V., Friedrichstraße 153 a, 10117 Berlin ("VLOG"). The group organiser is contractually entitled to use the VLOG "Ohne Gentechnik" Production and Certification Standard (VLOG Standard). Within the scope of this contractual relationship, VLOG undertakes to treat the aforementioned personal data confidentially and to only use them in internal assessments. VLOG does have the right to publish the aforementioned data in an anonymous manner (e. g. in statistics).

#### Right of withdrawal

The undersigned has the right to withdraw consent at any time with future effect without giving any reason. If consent is withdrawn, the group organiser shall immediately inform VLOG. The withdrawal of consent does not affect the lawfulness of data processing based on consent that was done before the withdrawal.

Place, date

Signature of the agricultural business

### VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage F\_Group Organisation Agriculture

1/22	Λ1
<i>v /</i> ¬	

Business:		Date of audit:		
		Duration of audit (time from - to):		
Identification number if available:		Auditor:		
VLOG-ID (10-xxxxx):		Responsible certification body:		
Audit participant business:		Combination with other standard(s):		
Sites that have been audited (incl. adress):		Focus of facility inspection:		
		Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□no
Scope of certification:		Is there a Licence Agreement with VLOG in place?	□ yes	□no
Grading		Audit result		
Number of A-gradings	0	Achieved percentage:		
Number of B-gradings	0	missing or incorrect entries!		
Number of C-gradings	0	inissing of incorrect entries:		
Number of N.Agradings	0	not passed		
Number of KO-gradings	0	not passed		
Total points	0			
Maximum achievable number of points	220			
Number of evaluated criteria	0			

Auditor's signature:

Business's signature:

		Grading (please select with " x ")						Corrective actions		
No. in Standard	Topic in Standard	A B		С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10 pts	5 pts	-10 pts	N.A.	not passed				
2	Requirements for Group Organisers									
F 2.1	Standard Usage Agreement with VLOG									
F 2.2.1	Group Description									
F 2.2.2	Members list									
F 2.2.3	Stable space overview									

No. in Standard	Topic in Standard		A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
F 2.2.4	Facility Description of the group members									
F 2.3	Contractual Binding of the Group Members	КО								
F 2.3.1	Data Release Statement (only Laying Hens – Eggs Group Organisation)									
F 2.4	Risk Management	ко								
F 2.5	Commissioning External Service Providers									

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts	N.A.	not passed			
F 2.6	Sampling and Testing								
F 2.6.1	Sampling and Testing Plan								
F 2.6.2	Sampling and Commissioning a Laboratory								
F 2.6.3	Frequency of Sampling and Testing								
F 2.6.4	Evaluation of Test Results								
F 2.6.5	Evaluation of the analytical data								
	Disclosure of test results to VLOG								
F 2.7	Training of Staff and Group Members								

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
F 2.8	Handling of Non-compliant Feed, Products and Animals	ко								
F 2.9	Complaint Management									
F 2.10	Crisis Management	ко								
F 2.11	Corrective Action, Ongoing Improvement Process									
F 2.12	Documentation and Retention Periods									
F 2.13	Internal Audits									

# **VLOG Facility Description Food Processing/Preparation Stage**

**Version** 01.09.22

#### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business.

Name of business								
Official approval or registration number (in accordance with Regulation EC No. 183/2005)								
Address of the business/site (including country code)								
Contact person & contact data (e.g., telephone, e-mail address)								
VLOG ID <sup>1</sup>								
Description of activities								
Areas of application of (cf. Annex 12 of the VLOG Standard		Portion VLOG (%) of the total production	Volume produced annually VLOG (kg, t or units)					
Use of the "Ohne GenTechnik	Use of the "Ohne GenTechnik" seal							
The "Ohne GenTechnik" seal is used on the following documents/media to label VLOG-certified food.  A licence agreement with VLOG is on file:  Labels,  Delivery slips, declarations  Delivery slips, invoices  Website  Other media (flyers, catalogues, etc.)								

 $<sup>^{1}</sup>$  (10-xxxxx cf. Standard Usage Agreement with VLOG)

# **VLOG Facility Description Food Processing/Preparation Stage**

**Version** 01.09.22

#### PART 2: ORGANISATION OF THE "VLOG" PRODUCTION

Othe	r sites				
	No other sites are include	ded in "Ohne Gentechnik" cert	tification.		
	Other sites are included	in "Ohne Gentechnik" certific	ation.		
Nar	ne of the business	Address		Activity/	process
	or others, see informal att		daga		change
	No activities and procedutsourced to third part	essors External Service Provious sees subject to certification unties (subcontractors/contract pand processes subject to certification)	nder the VLC orocessors).		
	Activity or process	Business engaged (name, address)	Contact partner(s) and contact data		Certification status (VLOG-certified/certified under a standard recognised as equivalent or included in the business' own VLOG certification)
	☐ For others, see info	ormai attachment			
PAR	T 3: SAMPLING & GMO	TESTING			
	Sampling and testing are	e <u>not</u> required:			
		products used are certified uvalent (If the item applies, continue		.OG Stand	ard or another standard
	possible. This applies, e must have a written san				
		ollity of raw materials")  ng (reference samples) and te  en sampling and testing plan.	sting of food	in "Ohne	Gentechnik" production.

## VLOG Facility Description Food Processing/Preparation Stage

Version 01.09.22

#### **PART 4: DOCUMENTS TO BE PREPARED**

The following information must be provided to the certification body/auditor, or must be examined during the audit.

- List of all raw materials and other production means (e.g. flavours, enzymes, cultures of microorganisms, additives, processing aids and other food ingredients) that are used in the "VLOG" products. The list must include, at a minimum, the following information:
  - Exact name of the raw material or other production means
  - Specification of GMO documentation on file (e.g. VLOG non-GMO certification, reference to Regulation (EC) 834/2007)
- List of "VLOG" products (products with the "Ohne GenTechnik" seal, B2B products, indicate print number in case of packing facilities)

#### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. I/we hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Risk category			
Date			
Signature			

VLOG Standard Annex 13 + 25

## VLOG Combined Facility Description Food Processing/Preparation and Logistics Stage

**Version** 01.09.22

#### **PART 1: BUSINESS PARAMETERS**

Please fill out all tables completely, and always check the answers that are applicable to your business.

Nar	ne of business			
regi acco	cial approval or stration number (in rdance with Regulation EC 183/2005)			
bus	lress of the iness/site (including ntry code)			
	ntact person & contact a (e.g., telephone, e-mail ress)			
VLC	OG ID <sup>1</sup>			
Des	cription of activities			
Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)			Portion VLOG (%) of the total production	Volume produced annually VLOG (kg, t or units)
Fo	od Processing/Preparatio	n		
Lo	gistics			
	☐ Transport			
	☐ Storage			
	☐ Handling			
	$\square$ (Drop-) shipping			
Use (	of the "Ohne GenTechnik" The "Ohne GenTechnik" A licence agreement wit Labels, declarations	seal is used on the foll		to label VLOG-certified food. r media (flyers, catalogues,

 $<sup>^{1}</sup>$  (10-xxxxx cf. Standard Usage Agreement with VLOG)

VLOG Standard Annex 13 + 25

## VLOG Combined Facility Description Food Processing/Preparation and Logistics Stage

**Version** 01.09.22

#### PART 2: ORGANISATION OF THE "VLOG" PRODUCTION

The business has a written sampling and testing plan.

		"Ohne Gentechnik" cert			
	ded in "O	hne Gentechnik" certific	ation.:	1	
Name of the business		Address		Activity/process	
For others, see informa	attachme	ent			
ocontractors/contract (	rocessor	External Service Provi	lers		cha
No activities and no				)G Standar	rd have been awarded or
· ·		ubcontractors/contract p			
	ties and p	processes subject to cer	tification un	der the V	LOG Standard have been
outsourced: Activity or process	Rusii	ness engaged (name,	Contact pa	artner(s)	Certification status
receivity of process	addr		and contact		(VLOG-certified/certified
					under a standard recognised as equivalent or included in
					the business' own VLOG
					certification)
☐ For others, see	informal	attachment			
RT 3: SAMPLING & G	MO TEST	ING			
od Processing/Preparat	ion:				
Sampling and testing		equired:			
		ts used are certified u (If the item applies, continue		.OG Stand	ard or another standard
There is a risk analys	is (in writ	ing) indicating why NO s	ampling or re	educed san	npling and GMO testing is
possible. This applie	s, e.g., wh	nen ingredients cannot b			a reduction, the business
must have a written		• •			
(Information sheet "Te	estability o	raw materials")			
Requirement of sam	pling (ref	erence samples) and te	sting of food	l in "Ohne	Gentechnik" production.

VLOG Standard Annex 13 + 25

## VLOG Combined Facility Description Food Processing/Preparation and Logistics Stage

Version 01.09.22

#### PART 3: SAMPLING & GMO TESTING

Logis	stics:									
	Sampling and testing are <u>not required</u> :									
	☐ Only storage, transport and/or transhipment									
	☐ Trading: Only tamper-proof, packaged goods (e.g. food in its final packaging, €	etc.).								
	<ul> <li>Trading of raw materials/products: Only VLOG-certified or certified under and recognised as equivalent.</li> </ul>	ther standard								
	Requirement of sampling (reference samples) and testing of food in "Ohne Gented The business has a written sampling and testing plan:  Trading of VLOG food	hnik" production.								

#### **PART 4: DOCUMENTS TO BE PREPARED**

The following information must be provided to the certification body/auditor, or must be examined during the audit.

- List of all stored, transported, handled and traded raw materials, food and other production means (e.g. flavours, enzymes, cultures of microorganisms, additives, processing aids and other food ingredients) that are used in "VLOG" products. The list must include, at a minimum, the following information:
  - o Exact name of the raw material or food and other production means
  - Record of available GMO documentation (e.g. VLOG non-GMO certification, specification, delivery slip, reference to Regulation (EC) 834/2007)
- Food Processing/Preparation: List of "VLOG" products (products with the "Ohne GenTechnik" seal, B2B products, indicate print number in case of packing facilities)
- Logistics: List of all suppliers of "VLOG" products (products with the "Ohne GenTechnik" seal)

#### PART 5: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION

The business itself checks the facility description once each calendar year, and it is up-to-date. We hereby declare the correctness of the information provided above.

Year of examination	202	202	202
Name			
Function			
Risk category			
Date			
Signature			

Business:			
Identification number if available:			
VLOG-ID (10-xxxxx):			
Audit participant business:			
Sites that have been audited (incl. adress):			
Scope of certification:			
Business risk grading			
(transferred from facility description):	Auditor:	Correction Evaluator:	

Date of audit:			
Duration of audit (time from - to):			
Auditor:			
Responsible certification body:			
Combination with other standard(s):			
Focus of facility inspection:			
Sampling during audit:	□ yes	□no	
Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□no	
Is there a Licence Agreement with VLOG in place?	□ yes	□no	

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	220
Number of evaluated criteria	0

Audit result
Achieved percentage:
missing or incorrect entries!
not passed

Auditor's signature:			

Business's signature:

		Grading (please select with " x ")							Corr	Corrective actions		
o. in andard	Topic in Standard	А			С		ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)		
		10	o pts 5		-10 pts	N.A.	not passed					
2	General Requirements											
G 2.1	Standard Usage Agreement with VLOG											
G 2.2	Facility Description											
G 2.3	Assignment of Responsibilities, Organisational Chart											
G 2.4	Risk Management	ко										

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements									
G 2.5	Commissioning External Service Providers									
G 2.6	Incoming Goods Inspection	ко								
G 2.7	Segregation of Goods Flows, Exclusion of Contamination	ко								
G 2.8	Handling of Non-compliant Raw Materials/Products	ко								
G 2.9	Inspection of Outgoing Goods, Labelling on Bills of Lading	ко								
G 2.10	Traceability	ко								
G 2.11	Complaint Management									

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 p	ts 5 p	ts -10 pts	N.A.	not passed			
G 2	General Requirements								
G 2.12	Goods Recall								
G 2.13	Crisis Management	О							
G 2.14	Corrective Action, Ongoing Improvement								
	Process								
G 2.15	Documentation and Retention Period								
G 2.16	Staff Training								
G 2.17	Internal Audits								

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements								
G 3	Specific Requirements for Plant-Based Raw Mat	erials							
G 3.1	Sampling and Testing								
G 3.1.1	Sampling and Testing Plan								
G 3.1.2	Sampling and Commissioning a Laboratory								
G 3.1.3	Frequency of Sampling and Testing								
G 3.1.4	Evaluation of Test Results								
G 4	Specific Requirements for Risk-Prone Raw Mate	rials/Ir	gredien	its					
G 4	Specific Requirements for Risk-Prone Raw Materials/Ingredients								

#### VLOG "Ohne Gentechnik" Production and Certification Standard - Combi-Checklist Stages B+G\_Food Processing/Preparation + Logistics

•	'n	2	n	1
•	,	≺.	u	

Business:			
Identification number if available:			
VLOG-ID (10-xxxxx):			
Audit participant business:			
Sites that have been audited (incl. adress):			
Scope of certification:		1	
Business risk grading			
(transferred from facility description):	Auditor:	Correction Evaluator:	

Date of audit:		
Duration of audit (time from - to):		
Auditor:		
Responsible certification body:		
Combination with other standard(s):		
Focus of facility inspection:		
Sampling during audit:	□yes	□no
Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□no
Is there a Licence Agreement with VLOG in place?	□ yes	□no

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	260
Number of evaluated criteria	0

Audit result
Achieved percentage:
missing or incorrect entries!
not passed

Auditor's signature:

Business's signature:

		G	radinį	g (plea:	se sele	ct with	" x ")		Corrective actions		
	Topic in Standard	Α					ко	Evaluation/Explanation	Corrective action (business)	Responsibility/	
Standard										dates/status (business)	
		10	) pts	5 pts	-10	N.A.	not passed				
					pts						
G 2	General Requirements for Food Processing,	/Prepai	ration	Stage							
G 2.1	Standard Usage Agreement with VLOG										
	0 0										
G 2.2	Facility Description										
0 2.2	Tacility Description										
633	Assignment of Responsibilities,										
	Organisational Chart										
	Organisacional Chart										
G 2.4	Risk Management	ко									
G 2.5	Commissioning External Service Providers										
1											
1											
1											
1											

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements for Food Processing	/Prep	paratio							
G 2.6		ко								
0 2.0	meening goods inspection									
G 2.7	Segregation of Goods Flows, Exclusion of Contamination	ко								
	Contamination									
G 2.8		ко								
	Materials/Products									
G 2.9	Inspection of Outgoing Goods, Labelling on	ко								
	Bills of Lading									
G 2.10	Traceability	ко								
G 2.10	Traceability	KU								
G 2.11	Complaint Management									

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 p	s 5 pt	-10 pts	N.A.	not passed			
G 2	General Requirements for Food Processing/	/Preparati	on Sta						
G 2.12	Goods Recall								
G 2.13	Crisis Management	ко							
G 2.14	Corrective Action, Ongoing Improvement Process								
G 2.15	Documentation and Retention Period								
G 2.16	Staff Training								
G 2.17	Internal Audits								

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)				
		10 pts	5 pts	-10 pts	N.A.	not passed							
G 2	General Requirements for Food Processing/Pre	paratio	n Stage										
G 3	Specific Requirements for Plant-Based Raw Materials												
G 3.1	Sampling and Testing												
G 3.1.1	Sampling and Testing Plan												
G 3.1.2	Sampling and Commissioning a Laboratory												
G 3.1.3	Frequency of Sampling and Testing												
G 3.1.4	Evaluation of Test Results												
G 4	Specific Requirements for Risk-Prone Raw Mate	rials/Ir	gredier	nts									
G 4	Specific Requirements for Risk-Prone Raw Materials/Ingredients												

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)				
Standard		10 pts	5 pts		N.A.	not passed			dates/status (business)				
G 2	General Requirements for Food Processing/Pr	eparatio	n Stage	pts									
B 4	Specific Requirements for Transport, Storage, Handling and/or Trade												
B 4.2	Sampling and Testing												
B 4.2.1	Sampling and Testing Plan												
B 4.2.2	Sampling and Commissioning a Laboratory												
B 4.2.3	Frequency of Sampling and Testing												
B 4.2.4	Evaluation of Test Results												

# Template for Group Description in Retail – Sale of Bulk Goods including Members List

Version 01.09.21

This document is a sample template for a group description. A group description must be submitted to the certification body at the time of the application. The group organiser must notify the certification body of any major changes pertaining to VLOG certification.

## Group description of "SaGroRe GmbH" retail sample group

Group organiser:

SaGroRe GmbH

Sample street 12, 54321 Sample town

Responsible for group certification:

Sam Sample (QM Officer of SaGroRe GmbH)

Phone: 0123 4567 89 Email: s.sample@sagrore.com

Activities of group members:

Sample text: The members of the SaGroRe VLOG group are branches of SaGroRe GmbH, in which bulk food of animal origin that meets the requirements of the VLOG Standard is sold directly to consumers [...].

The branches further process bulk food of animal origin. The processing is organised as follows:

The branches are mainly located in the administrative districts/federal states/countries of [...].

Contractors, subcontractors and outsourced processes:

The following contractors are included in the SaGroRe group:

Areas of responsibility of the group organiser:

Sample text: SaGroRe is responsible for risk management of distributing "VLOG" quality bulk food of animal origin and has a crisis management system, in which the group members are integrated [...].

SaGroRe arranges the certification and audit process [...] with the certification body. It initiates and monitors corrective measures together with the affected companies [...].

SaGroRe GmbH carries out an internal audit of the branches annually. [...]

Basis for the initial and subsequent certifications

Sample text: SaGroRe's purchasing of "VLOG" food is centrally regulated. Therefore, in addition to the audit of the group organiser, the certification body will carry out random audits annually at 10% of the branches.

Or:

SaGroRe's purchasing of "VLOG" food is regulated on a decentralised basis. The certification body will carry out audits of the group organiser and 100% of the branches annually.

# Template for Group Description in Retail – Sale of Bulk Goods including Members List

Version 01.09.21

Use of several certification bodies

[If multiple certification bodies are used, the group description must clearly indicate which tasks are to be performed by which certification body.]

Sample text: Three certification bodies (A-cert, B-cert, C-cert) are used for the VLOG certification of the SaGroRe group.

A-cert audits the group organiser and the following part of the group [list containing the branches, the region, or another reference list such as the members list].

B-cert will audit [see list above]. C-cert will audit [see list above].

B-cert and C-cert give their audit results to A-cert, which will issue the VLOG certificate to the group. There is an agreement between the certification bodies for the exchange of data.

Other documents [integrated into the group description or as extra documents]

- Organisational chart: Organisational chart of the business incl. responsibilities and a representation plan to cover absences in operating procedures relevant to "Ohne Gentechnik".
- <u>List of products</u>: Overview or specifications for bulk "Ohne Gentechnik" goods offered by the business, including consideration of re-working
- For further processing of bulk "Ohne Gentechnik" goods and the use of further ingredients which are not purchased from VLOG certified suppliers (e.g. marinades, spice blends): A list of all formulations with quantity or weight-related information on "Ohne Gentechnik" ingredients and components, including consideration of re-working
- <u>List of suppliers</u>: All authorised suppliers of "Ohne Gentechnik" food/ingredients

# Template for Group Description in Retail – Sale of Bulk Goods including Members List

Version 01.09.21

This section contains a sample template of a member list for group certification in agriculture. The group organiser must always keep the member list up to date. The group organiser has to promptly notify the certification body of any relevant changes. The following member list below or a member list with equivalent content may be used. [Information in boldface is mandatory according to the Standard; the remainder is recommended.]

List of members/sites of SaGroRe GmbH

Name/ Branch	Address	Centralised or decentralised purchase	Group member since	Most recent routine audit/initial audit by the certification body	Responsible certification body <sup>1</sup>
SaGroRe Sample town	Sample street 2, 87654 Sample town	centralised	[Date]	[Date]	A-Cert
Retail site, city, Sample city	Main street 1, 54321 Sample city	decentralised	[Date]	Has not yet taken place	C-Cert
[]					

<sup>&</sup>lt;sup>1</sup> Only relevant if the group uses multiple certification bodies for VLOG certification

## VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage H\_Retail - Sale of bulk food of animal origin (Central V23.01 Office)

Business:		Date of audit:	
		Duration of audit (time from - to):	
Identification number if available:		Auditor:	
VLOG-ID (10-xxxxx):		Responsible certification body:	
Audit participant business:		Combination with other standard(s):	
Sites that have been audited (incl. adress):		Focus of facility inspection:	
Scope of certification:		Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□yes □no
Centralised or decentralised purchase of VLOG food/raw materials	□ centralised □ decentralised	Is there a Licence Agreement with VLOG in place?	□yes □no
			7
Grading		Audit result	
Number of A-gradings	0	Achieved percentage:	
Number of B-gradings	0	missing or incorrect entries!	
Number of C-gradings	0	missing of meoriest entries.	
Number of N.Agradings	0	not passed	
Number of KO-gradings	0		
Total points	0		
Maximum achievable number of points	170		
Number of evaluated criteria	0		
Auditor's signature:		Business's signature:	
Additor 5 Signature.		business s signature.	

		Gra	ding	(pleas	se sele	ct with	" x ")		Corrective actions		
No. in Standard	Topic in Standard	Α	В		С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10	ots 5	pts	-10 pts		not passed				
H 2	Requirements for Group Organisers and G	iroup Me	mbe								
H 2.1	Standard Usage Agreement with VLOG										
H 2.2.1	Group description										
H 2.2.2	Members list										
H 2.3	Contractual Binding of the Group Members	ко									
H 2.4	Risk Management	ко									
H 2.5	Approval of Suppliers and Articles										

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
				5 pts	-10 pts	N.A.	not passed			
H 2.6		ко								
H 2.7	Segregation of Goods Flows/Exclusion of Contamination	ко								
H 2.8	Processing									
H 2.9	Training of Staff and Group Members									
H 2.10	Materials/Products	ко								
H 2.11	Labelling									
H 2.12	Traceability	ко								

No. in	Topic in Standard	Α	В		С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/
Standard										dates/status (business)
		10	ts 5 p	pts	-10		not			
					pts		passed			
H 2.13	Crisis Management K	0								
H 2.14	Corrective Action, Ongoing Improvement									
	Process									
11.2.45	Decree de la constant		-							
H 2.15	Documentation and Retention Periods									
H 2.16	Internal Audits									
1										

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts		-10 pts		not passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts		-10 pts		not passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts	5 pts	-10	N.A.	not			
				pts		passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts	5 pts	-10	N.A.	not			
				pts		passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts	5 pts	-10	N.A.	not			
				pts		passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts		-10 pts		not passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts		-10 pts		not passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts	5 pts	-10	N.A.	not			
				pts		passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts		-10 pts		not passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts	5 pts	-10	N.A.	not			
				pts		passed			

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	,	Responsibility/ dates/status (business)
		10 pts	5 pts	-10	N.A.	not			
				pts		passed			

### VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage H\_Retail - Sale of bulk food of animal origin (Branch)

V23.01

Business:	
Identification number if available:	
VLOG-ID (10-xxxxx):	
Audit participant business:	
Sites that have been audited (incl. adress):	
Scope of certification:	
Centralised or decentralised purchase of VLOG food/raw materials	□ centralised □ decentralised

Date of audit:		
Duration of audit (time from - to):		
Auditor:		
Responsible certification body:		
Combination with other standard(s):		
Focus of facility inspection:		
Sampling during audit:	□yes	□no
Is the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□no
Is there a Licence Agreement with VLOG in place?	□yes	□no

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	120
Number of evaluated criteria	0

Audit result
Achieved percentage:
missing or incorrect entries!
not passed

Auditor's	signature:
Additor 3	Jigilatai C.

Business's signature:

		Gr	Grading (please select with " x ")					Corrective actions		
No. in	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/	
Standard									dates/status (business)	
		10	pts 5 pts		N.A.	not				
				pts		passed				
H 2	Requirements for Group Organisers and Gr	roup M	embers							
H 2.5	Approval of Suppliers and Articles									
H 2.6	Incoming Goods Inspection	(O								
H 2.7	Segregation of Goods Flows/Exclusion of	(O								
	Contamination									
H 2.8	Processing									
H 2.9	Training of Staff and Group Members									
H 2.10	Handling of Non-compliant Raw	(0								
	Materials/Products									
L										

No. in Standard	Topic in Standard		Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts		N.A.	not			
H 2.11	Labelling				pts		passed			
N 2.11	Labelling									
H 2.12	Traceability	КО								
H 2.13	Crisis Management	КО								
H 2.14	Corrective Action, Ongoing Improvement Process									
H 2.15	Documentation and Retention Periods									
H 2.16	Internal Audits									

### **VLOG Grinding and Mixing Protocol** for Grinding and Mixing Facilities

Version: 01.09.22 **Obligatory as of:** 01.01.23

Title changed

Agricultural operation, address (company stamp, if applicable): Mobile facilities only: Operator, address (company stamp, if applicable): changed licence plate number: Previous feed mixture produced from: exclusively feed not subject to compulsory labelling\* (including) the following feeds subject to compulsory labelling\*\*: Measures implemented to prevent carryover of GMO feed: Complete discharge Purges, consisting of type and amount: Where was the purge batch used? changed Feed mixture made for "Ohne Gentechnik" VLOG production: Compound feed description (animal type/category/phase): Single-component feed Silo no./description/ Amount (kg) storage location

With their signature below, both the agricultural business and the facility operator confirm the accuracy of the above information.

DATE **BUSINESS SIGNATURE SIGNATURE** 

Total:

1/1

OF FACILITY OPERATOR

<sup>\*</sup>Feed which is not subject to compulsory labelling as "genetically modified" according to Regulations (EC) No. 1829/2003 or No. 1830/2003

<sup>\*\*</sup> Must only be specified by non-VLOG-certified mobile grinding and/or mixing facilities

### VLOG Incident Sheet Feed Manufacturing and Logistics

Version: 01.09.22

Obligatory as of: 01.01.23

## **Explanations for the VLOG Incident Sheet**

Note: In case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective matrix locations. Please use the VLOG Matrix Certification Incident Sheet for this purpose.

1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant feed is placed on the market as "VLOG geprüft" or with the "VLOG geprüft" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of feed manufacturing and logistics:

- GMO feed subject to compulsory labelling under EU Regulations 1829/2003 and 1830/2003<sup>1</sup> was marketed as "VLOG geprüft"<sup>2</sup>
- Feed containing GMOs that are not approved in the EU was marketed as "VLOG geprüft"<sup>3</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

Certified businesses must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG. In this case, each business has to fill out a separate incident sheet, but one incident sheet can be used for multiple locations of a single business. In the case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective matrix locations.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

• Email: ereignisfall@ohnegentechnik.org

• Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an incident report).

As a general rule, the sooner a case is reported to VLOG the better, even if the information is still incomplete.

3. How can VLOG be reached if there is an incident?

• VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)

VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

<sup>&</sup>lt;sup>1</sup> Under those regulations, the GMO content of the feed components may not exceed 0.9 %. Values between 0.1 % and 0.9 % are only permissible if they are accidental or technically unavoidable.

<sup>&</sup>lt;sup>2</sup> Guidance for handling mislabeled fee in in the VLOG Production can be found here: <a href="https://www.ohnegentechnik.org/standard001/">https://www.ohnegentechnik.org/standard001/</a>

<sup>&</sup>lt;sup>3</sup> The quantity of non-approved GMOs in the feed is irrelevant.

# VLOG Incident Sheet Feed Manufacturing and Logistics

**Version:** 01.09.22

Obligatory as of: 01.01.23

changed

Sign and submit to VLOG e.V.:

Email: ereignisfall@ohnegentechnik.org

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents:

VLOG Head Office: +49 (0)30 2359 945 00

Outside of business hours: +49 (0)30 2359 945 09

#### 1. Information regarding the business

Name of Business		
Business Activity Area	Logistics stage	
	(Drop) shipping	Storage/handling Transport
	Feed Manufacturin	g stage
	Manufacturing/	processing Grinding and mixing facility
	Business is part of a	VLOG matrix certification
Business Address	Street address	
	Postal code, city	
	Country	
VLOG ID <sup>4</sup>		
Emergency contact	Name	
person for VLOG	Telephone number	
	Email/Fax	
VLOG certification	Name	
body	The certification boo	dy has already been informed of the incident → If this is
	not the case, please	e do so immediately
Business locations		
affected by the		
incident (including Sub		
ID, if any):		

#### 2. Information regarding the incident

#### Type of incident

Positive GMO test result for a feed sample

Error/commingling Contamination within the business (e.g. feed in the wrong silo)

**Error/commingling Contamination** in another business:

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you become aware of the incident?

How did you learn of the incident?

<sup>&</sup>lt;sup>4</sup> Businesses that are part of a matrix certification do not have their own VLOG IDs. Please enter the name of the matrix organiser.

## **VLOG Incident Sheet Feed Manufacturing and Logistics**

Single-component feed

A list of affected customers is attached. The list includes quantities and delivery dates.

Affected business partners (esp. customers and suppliers) have been informed of the incident by

Other:

Version: 01.09.22 Obligatory as of: 01.01.23

added

Parts in table added

Compound feed

thereof already placed on the market

Feed affected by the incident (please list additional feed on a separate sheet)

Supplier VLOG certified/certification recognized as equivalent

Feed from own production – date of manufacture:

Test results (Please list additional results on a separate sheet)

Feed purchased from a supplier:

Contact person: Delivery date:

Yes Feed in contract manufacturing for:

Address:

Address:

telephone and in writing<sup>5</sup>

Contact person:

No

Unique name of the feed (commercial name) Type of feed

Batch no/delivery slip no Total quantity affected

Marketing period

	Date	Signature
	ou taken or are planning to take? V	When were they taken or will be taken?
No GMO test wa	as conducted	
Test laboratory		
Amount of GMO conter species (e.g. soy, corn	•	% %
Sampling location <sup>6</sup> Test result (PCR):		9/
Date sample taken		

# VLOG Incident Sheet Matrix Organiser Feed Manufacturing and Logistics

**Version:** 01.09.22

Obligatory as of: 01.01.23

# **Explanations for the VLOG Incident Sheet**

Note: In case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective members. Members are not required to submit separate incident reports in that case.

#### 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant feed is placed on the market as "VLOG geprüft" or with the "VLOG geprüft" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of feed manufacturing and logistics:

- GMO feed subject to compulsory labelling under EU Regulations 1829/2003 and 1830/2003<sup>1</sup> was marketed as "VLOG geprüft"<sup>2</sup>
- Feed containing GMOs that are not approved in the EU was marketed as "VLOG geprüft"<sup>3</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases
  of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

The matrix organiser must notify VLOG about any incidents. The matrix organiser assumes (pooled) reporting responsibility for the respective matrix members. All cases should be reported, even if the organiser is uncertain whether a situation represents an incident or not.

If the matrix organiser does not report the incident, each business must fill out its own *Feed Manufacturer* and Logistics Incident Sheet.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

• Email: ereignisfall@ohnegentechnik.org

Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

As a general rule, the sooner a case is reported the better, even if the information is still incomplete.

#### 3. How can VLOG be reached if there is an incident?

• VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)

• VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

<sup>&</sup>lt;sup>1</sup> Under those regulations, the GMO content of the feed components may not exceed 0.9 %. Values between 0.1 % and 0.9 % are only permissible if they are accidental or technically unavoidable.

<sup>&</sup>lt;sup>2</sup> Guidance for handling mislabeled fee in in the VLOG Production can be found here: <a href="https://www.ohnegentechnik.org/standard001/">https://www.ohnegentechnik.org/standard001/</a>

<sup>&</sup>lt;sup>3</sup> The quantity of non-approved GMOs in the feed is irrelevant.

## **VLOG Incident Sheet Matrix Organiser Feed Manufacturing and** Logistics

Version: 01.09.22

Obligatory as of: 01.01.23

Sign and submit to VLOG e.V.:

Email: ereignisfall@ohnegentechnik.org

+49 (0)30 2359 945 00

Fax: +49 (0)30 2359 945 01

VLOG Head Office: Outside of business hours: +49 (0)30 2359 945 09

VLOG contact data for emergency incidents:

#### 1. Information regarding the matrix organisation

Name of matrix organisation						
Activity area of VLOG matrix	Logistics Stage					
	(Drop) shipping	(Drop) shipping Storage/handling Transport				
	Feed Manufacturing S	Stage				
	Manufacturing/P	rocessing Grinding	and mixing facility			
Address of matrix organisation	Street address					
	Postal code, city					
	Country					
VLOG ID						
Emergency contact person for	Name					
VLOG	Telephone number					
	Email/Fax					
VLOG certification body	Name					
		n body has already been s is not the case, please d				
Matrix sites/members affected by the incident						
(more) see annex						

#### 2. Information regarding the incident

#### Type of incident

Positive GMO test result for a feed sample

Error/commingling Contamination in the business (e.g. feed in the wrong silo)

**Error/commingling Contamination** in another business:

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When was the incident first noticed (by you or the matrix site?)

How did you learn of the incident?

changed

# VLOG Incident Sheet Matrix Organiser Feed Manufacturing and Logistics

Version: 01.09.22

Obligatory as of: 01.01.23

Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production – date of manufacture:

Feed purchased from a supplier:

Contact person:

Address:

Delivery date:				
Supplier VLOG certified	d/certification recogniz	ed as equiv	alent	1
No Yes	_	•		added
Feed in contract manuf	acturing for:			
Address:	-			
Contact person				Parts in table added
				Tarts in table added
Unique name of the feed				
(commercial name)	Cinala anno anno		Carra and Card	
Type of feed	Single-componer	it feed	Compound feed	
	Other:			
Batch no/delivery slip no	., .			
Total quantity affected	thereof	iready piace	ed on the market	
Marketing period				
Affected business partr	ners (esp. customers an	d suppliers)	have been informed of the in	ncident by
telephone and in writin	g <sup>4</sup>			
A list of affected custor	ners is attached. The lis	it includes q	uantities and delivery dates.	
Test results (Please list additi	onal results on a sepa	rate sheet	)	
A GMO test was condu	·			
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
Sample taken by:				
Date sample taken				
Sampling location <sup>5</sup>			<u> </u>	
Test result (PCR):				%
Amount of GMO content per				%
species (e.g. soy,				%
maize/corn)				
Test laboratory				
No GMO test was cond	ucted			
3. Measures				
What measures have you taker	or are you planning to	take? Whe	n were they taken or will be t	taken?
Place	Date		Signature	_
<del>-</del>	<del></del>			
	_			

<sup>&</sup>lt;sup>4</sup> Unless otherwise contractually agreed

<sup>&</sup>lt;sup>5</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like

# VLOG Incident Sheet Agriculture and Livestock Trade

Version: 01.09.22

Obligatory as of: 01.01.23

## **Explanations for the VLOG Incident Sheet**

Note: For VLOG group certifications, the group organiser can assume (pooled) reporting responsibility for group members (cf. VLOG Incident Sheet for Agricultural Group Organiser). Farmers are not required to submit separate incident reports.

#### 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant animals or food is placed on the market with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of agriculture and livestock trade:

- Animals/animal products were marketed as "VLOG" or with the "Ohne GenTechnik" seal, although they
  do not meet the requirements of the VLOG Standard (e.g. required minimum feeding conversion period
  was not (yet) met by the time of sale; GMO feed subject to compulsory labelling was fed, so that the
  minimum feeding conversion period had to be started over)<sup>1</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

The certified business must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG. In this case, each business has to fill out a separate incident sheet. If the group organiser reports the incident for group certifications, individual group members are not required to repot it separately. One incident sheet can be used for multiple locations of a single business.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

• Email: ereignisfall@ohnegentechnik.org

• Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

As a general rule, the sooner a case is reported the better, even if the information is still incomplete.

#### 3. How can VLOG be reached if there is an incident?

• VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)

• VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

<sup>&</sup>lt;sup>1</sup> Guidance for handling mislabeled fee in in the VLOG Production can be found here: <a href="https://www.ohnegentechnik.org/standard001/">https://www.ohnegentechnik.org/standard001/</a>

# VLOG Incident Sheet Agriculture and Livestock Trade

**Version:** 01.09.22

Obligatory as of: 01.01.23

Sign and submit to VLOG e.V.:

Email: ereignisfall@ohnegentechnik.org

Fax: +49 (0)30 2359 945 01

VLOG contact data for emergency incidents:

VLOG Head Office: +49 (0)30 2359 945 00 Outside of business hours: +49 (0)30 2359 945 09

#### 1. Information regarding the business

Name of business					
Business activity area	Agriculture Animal production: Plant-based feed production for own facility Livestock transport/livestock trade  Business is part of a VLOG group certification				
	Street address				
Business address	Postal code, city				
	Country				
VLOG ID (or the name of the organiser <sup>2</sup> )					
	Name				
Emergency contact person for VLOG	Telephone number				
person 15. 1200	Email/Fax				
VLOG certification	Name				
body	The certification body has already been informed of the incident → If this is not the case, please do so immediately				
Business locations affected by the incident (including Sub ID, if any):		·			

#### 2. Information regarding the incident

#### Type of incident

Feed containing GMOs was fed to VLOG animals, so that the minimum feeding conversion period must restart

Animals/products were marketed as "VLOG" although the requirements of the VLOG Standard were not met (e.g. minimum feeding conversion period not met)

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you become aware of the incident?

How did you learn of the incident?

-

<sup>&</sup>lt;sup>2</sup> Businesses that are part of a group certification do not have their own VLOG IDs. Enter the name or VLOG ID of the group organiser.

# VLOG Incident Sheet Agriculture and Livestock Trade

**Version:** 01.09.22

Obligatory as of: 01.01.23

Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production

Compound feed from mobile/jointly used or stationary/business-owned grind and mixing facility Feed purchased from a supplier:

Address:

No

Contact person:

Yes

Delivery date:

#### Supplier VLOG certified/certification recognized as equivalent

added

Parts in table added

Feed name (commercial name)		
Type of feed	Single-component feed Compound feed Other:	
Total quantity affected	Amount already fed to animals	
Batch no/delivery slip no		

Which animals and products were affected by the incident? (animal type/number/barn/product amounts)

Test result (Please list additional results on a separate sheet)

A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>3</sup>	
Test result (PCR):	%
Amount of GMO content per	%
species (e.g. soy,	%
maize/corn)	70
Test laboratory	

No GMO test was conducted

#### 3. Measures

Feeding period

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>4</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

What measures have you taken or are you planning to take? When were they taken or will be taken?

Place	Date	Signature

<sup>&</sup>lt;sup>3</sup> E.g. at delivery of feed, test completed by supplier, or other

<sup>&</sup>lt;sup>4</sup> Unless otherwise contractually agreed

## VLOG Incident Sheet Group Organiser Agriculture

Version: 01.09.22

Obligatory as of: 01.01.23

# **Explanations for the VLOG Incident Sheet**

Note: In case of a VLOG group certification, the group organiser can assume (pooled) reporting responsibility for the respective group members, using the Agricultural Group Organiser Incident Sheet.

#### 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant animals or food is placed on the market with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of agriculture:

- Animals/animal products were marketed as "VLOG" or with the "Ohne GenTechnik" seal, although they
  do not meet the requirements of the VLOG Standard (e.g. required minimum feeding conversion period
  was not (yet) met by the time of sale; GMO feed subject to compulsory labelling was fed, so that the
  minimum feeding conversion period had to be started over)<sup>1</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

The VLOG group organiser must notify VLOG about any incidents. In doing so, the group organiser assumes (pooled) reporting responsibility for the respective group members. All cases should be reported, even if the group organiser is uncertain whether a situation represents an incident or not.

If the group organiser does not report the incident, each business must fill out its own *Agricultural and Livestock Trade Incident Sheet*.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

Email: ereignisfall@ohnegentechnik.org

• Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

As a general rule, the sooner a case is reported to VLOG the better, even if the information is still incomplete.

3. Who can I contact if there is an incident?

VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)

VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

<sup>&</sup>lt;sup>1</sup> Guidance for handling mislabeled fee in in the VLOG Production can be found here: <a href="https://www.ohnegentechnik.org/standard001/">https://www.ohnegentechnik.org/standard001/</a>

# **VLOG Incident Sheet Group Organiser Agriculture**

**Version:** 01.09.22

Obligatory as of: 01.01.23

Sign and submit to VLOG e.V.: VLOG contact data for emergency incidents:

 Email: <a href="mailto:ereignisfall@ohnegentechnik.org">ereignisfall@ohnegentechnik.org</a>
 VLOG Head Office: +49 (0)30 2359 945 00

 Fax: +49 (0)30 2359 945 01
 Outside of business hours: +49 (0)30 2359 945 09

#### 1. Information regarding the group organiser

Name of business		
Business address	Street address	
	Postal code, city	
	Country	
VLOG ID		
Emergency contact	Name	
person for VLOG	Telephone number	
	Email/Fax	
VLOG certification body	Name	
		on body has already been informed of the incident not the case, please do so immediately
Group members affected		
by the incident:		
(more) see annex		

#### 2. Information regarding the incident

#### Type of incident

Other:

Feed containing GMOs was fed to VLOG animals, so that the minimum feeding conversion period must restart

Animals/products were marketed as "VLOG" although the requirements of the VLOG Standard were not met (e.g. minimum feeding conversion period, accidental swapping of animals/products)

Brief description of the incident (What happened? What is the (possible) cause?)

When was the incident noticed (by you and/or the group member)?

How did you learn of the incident?

### VLOG Incident Sheet Group Organiser Agriculture

Version: 01.09.22
Obligatory as of:

Obligatory as of: 01.01.23

Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production

Compound feed from mobile/jointly used or stationary/business-owned mixing and grinding facility Feed purchased from a supplier:

Address:

No

Contact person:

Yes

Delivery date:

#### Supplier VLOG certified/certification recognized as equivalent

added

Parts in table added

Feed name (commercial name)	
Type of feed	Feed material Compound feed Other:
Total quantity affected	Amount already fed to animals
Batch no/delivery slip no	
Feeding period	

Which animals and products were affected by the incident? (animal type/number/barn/product amounts)

Test result (Please list additional results on a separate sheet)

A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>2</sup>	
Test result (PCR):	%
Amount of GMO content per	%
species (e.g. soy,	%
maize/corn)	
Test laboratory	·

No GMO test was conducted

#### 3. Measures

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>3</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

What measures have you taken or are you planning to take? When were they taken or will be taken?

Place	 Date	Signature		

<sup>&</sup>lt;sup>2</sup> E.g. at delivery of feed, test completed by supplier, or other

<sup>&</sup>lt;sup>3</sup> Unless otherwise contractually agreed

# VLOG Incident Sheet Food Processing/Preparation, Logistics and Retail (Sale of Bulk Food of Animal Origin)

**Version:** 01.09.22

Obligatory as of: 01.01.23

## **Explanations for the VLOG Incident Sheet**

1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant food is placed on the market as "VLOG" or with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of food processing and logistics as well as retail:

- Food that does not meet the requirements of the EC Genetic Engineering Implementation Act<sup>1</sup> was marketed as "VLOG" or with the "Ohne GenTechnik" seal
- Food containing GMOs that are not approved in the EU was marketed as "VLOG" or with the "Ohne GenTechnik" seal<sup>2</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

#### 2. How should incidents be reported to VLOG?

Certified businesses must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG. In this case, each business has to fill out a separate incident sheet, but one incident sheet can be used for multiple locations of a single business.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

• Email: ereignisfall@ohnegentechnik.org

• Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

As a general rule, the sooner a case is reported the better, even if the information is still incomplete.

3. How can VLOG be reached if there is an incident?

• VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)

• VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

<sup>&</sup>lt;sup>1</sup> This includes, among others, any food that is subject to compulsory labeling as GMO pursuant to EU regulations 1829/2003 and 1830/2003; food with a GMO content > 0,1 % and any products of animal origin in which the statutory minimum feeding period was not complied with.

<sup>&</sup>lt;sup>2</sup> The quantity of non-approved GMOs in the food is irrelevant.

# VLOG Incident Sheet Food Processing/Preparation, Logistics and Retail (Sale of Bulk Food of Animal Origin)

**Version:** 01.09.22

Obligatory as of: 01.01.23

Sign and submit to VLOG e.V.: VLOG contact data for emergency incidents:

 Email: <a href="mailto:ereignisfall@ohnegentechnik.org">ereignisfall@ohnegentechnik.org</a>
 VLOG Head Office: +49 (0)30 2359 945 00

 Fax: +49 (0)30 2359 945 01
 Outside of business hours: +49 (0)30 2359 945 09

1. Information regarding the business/retail group organiser

Name of business			
Business activity area	Logistics Stage		
	(Drop) shipping	Storage/handling	Transport
	Food Processing/Pre	paration Stage	
	Retail Stage – Sale of	f Bulk Food of Animal O	rigin
Business address	Street address		
	Postal code, city		
	Country		
VLOG ID <sup>3</sup>			
Emergency contact	Name		
person for VLOG	Telephone number		
	Email/Fax		
VLOG certification	Name		
body	The certification body has already been informed of the incident → If this is		
	not the case, please	e do so immediately	
Business locations			
affected by the			
incident			
(including Sub ID or			
employee, if any):			

#### 2. Information regarding the incident

#### Type of incident

Positive GMO test result for raw material/food

Error/commingling Contamination within the business: (e.g. non-compliant raw materials in "VLOG" products)

**Error/commingling Contamination** in another business:

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you learn of the incident?

How did you learn of the incident?

<sup>3</sup> Businesses that are part of a matrix/group certification do not have their own VLOG IDs. Enter the name or VLOG ID of the matrix/group organiser.

changed

# VLOG Incident Sheet Food Processing/Preparation, Logistics and Retail (Sale of Bulk Food of Animal Origin)

**Version:** 01.09.22

Obligatory as of: 01.01.23

Product affected by the incident (please list additional products on a separate sheet)

Product from own production – date of manufacture:

Purchased product or raw materials purchased from a supplier:

Raw material/p	roduct:					
Address:				Contact person:		
Delivery date:						
Supplier VLOG certified	/certification	recogniz	ed as equival	ent		المعامما
No Yes						added
Product in contract mar	nufacturing for	:				
Raw material/p	roduct:					1
Address:				Contact person:		Parts in table added
Unique name of the product (commercial name)						
Item description according to specification						
Batch no/delivery slip no						
Total quantity affected		thereof	already plac	ed on the market		
Marketing period		to				
A list of affected custom Test result (Please list additio A GMO test was conduc	nal results on	a separa	ate sheet)	·	dates.	
Sample taken by:						
Date sample taken						
Sampling location <sup>5</sup>						
Test result (PCR):						%
Amount of GMO content per species (e.g. soy,						%
maize/corn)						%
Test laboratory						
No GMO test was conducted 3. Other information/mea What measures have you taken	sures	nning to	take? When	were they taken or v	will be tak	cen?
Place	Date -			Signature		

<sup>&</sup>lt;sup>4</sup> Unless otherwise contractually agreed

 $<sup>^{5}</sup>$  E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like