



# **“Ohne Gentechnik” Production and Certification Standard Part B - Logistics**

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## Part B - Logistics

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

### B 1 Stage Definition and Mandatory Certification

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

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

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

	<b>Certification required according to VLOG Standard</b>	<b>Certification not required according to VLOG Standard</b>	<b>Standard requirements</b>
	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” <sup>*</sup> 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 contamination or tampering.	For trading of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2, B 4
	For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that at least one of the following conditions is met: <ul style="list-style-type: none"> <li>• The trader issues delivery slips of its own for certified goods with the “VLOG” label</li> <li>• The trader commissions non-VLOG-certified carriers or the transport site is <u>not</u> included in</li> </ul>	For trading of sealed VLOG-certified food between two VLOG-certified businesses, provided that all of the following conditions are met: <ul style="list-style-type: none"> <li>• The goods are VLOG certified</li> <li>• The originating processing business is listed on the delivery slips</li> <li>• The certified goods are labelled “VLOG” on the delivery slip</li> </ul>	B 1 - B 2, B 4

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

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



	<b>Certification required according to VLOG Standard</b>	<b>Certification not required according to VLOG Standard</b>	<b>Standard requirements</b>
	<ul style="list-style-type: none"> <li>The processing facility does <u>not</u> have currently valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)</li> <li>The carrier is <u>not</u> VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1.</li> </ul>	<ul style="list-style-type: none"> <li>The processing facility has currently valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)</li> <li>The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1. There is adequate proof of integration.</li> </ul>	
		For drop shipping of bagged/tamper resistant packaged VLOG-certified food/ingredients (e.g., as soon as they have been packaged in end consumer packaging).	
<p><b>Sub-stage Private labelling of feed:</b> Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the client's (private labeller) specifications or the goods are purchased from the-client and sold in the Private Labeller's name.</p>			
Feed	For businesses, that operate as private labellers for bagged and/or bulk feed and market/label the feed as "VLOG geprüft"*.	For businesses that operate as private labellers for feed and do not market/label the feed as "VLOG geprüft".	B 1 - B 2, B 7

**Table B 1: Stage Definition and Mandatory Certification**

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

## B 2 General Requirements

### B 2.1 Standard Usage Agreement with VLOG

For individually certified businesses there is a Standard Usage Agreement with VLOG signed by both parties, including the VLOG ID (10-xxxxx) issued by VLOG. A VLOG sub-ID (10-xxxxx-A/B, etc.) is required for all sites that are included in the VLOG-certification and are legally dependent of the main site.

### B 2.2 Facility Description

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

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

**i** *Explanation: Information transmitted in electronic form will be accepted. 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 current 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.*

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

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

### B 2.3 Assignment of Responsibilities, Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

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

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

### **Risk analysis**

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

The risk analysis at a minimum covers the following points:

- Raw materials and feed for the “VLOG geprüft” and/or “Ohne Gentechnik”/“VLOG” area (e.g. countries of origin)
- Handling of feed, raw materials and products that meet the requirements for “VLOG”/“Ohne Gentechnik” or “VLOG geprüft” labelling and feed, raw materials and products that do not meet the requirements for “Ohne Gentechnik” or “VLOG geprüft” labelling
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous cargo in the case of vehicles
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

### **Risk management**

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

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

External service providers may be commissioned for activities requiring certification in the areas of Feed Manufacturing, Transport, Storage, Handling and/or (drop) shipping (cf. B 1 Logistics, C1 Feed Manufacturing, G1 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 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 Contamination (KO)**

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

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

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

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

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

The responsibilities are to be defined in the procedure.

Test results are to be evaluated in accordance with Chapter B 4.2.4.



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

## B 2.8 Outgoing Goods Inspection, Labelling on Bills of Lading

### **Feed**

It must be ensured that only feed that meet in full the requirements for “VLOG geprüft” labelling leave the business.

VLOG-certified feed must be clearly labelled on the bills of lading or in the case of bagged goods on the packaging using the word mark “VLOG geprüft” and/or the “VLOG geprüft” seal (cf. Chapter A 10.2). It must be clearly evident to which feed item the labelling refers.



*Explanation: For the declaration of feed that is exempt from mandatory labelling but is not VLOG-certified, VLOG recommends 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: ...”*

### **Food**

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

VLOG-certified raw materials and products must be clearly labelled on the 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 regulation for the delivery must ensure the above-listed labelling.



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

## B 2.9 Traceability (KO)

The introduced/installed traceability system must guarantee that:

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



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

- *Information on supplier and delivery date*
- *Quantity*
- *Batch/lot formation, if applicable/done*
- *Information on delivery date and supplied customers*

## B 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.

## B 2.11 Goods Recall

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

## B 2.12 Crisis Management (KO)



*Explanation: Incidents are defined on the incident sheet (cf. Annexes (31) and (35)).*

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

- The steps to follow in the event of an incident
- Assigned persons in charge including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provision requiring immediate notification of:
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (31) or (35))
  - the VLOG Head Office using the VLOG Incident Sheet (see Annex (31) or (35))
- Legal advice (if required)

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

## B 2.13 Corrective Action, Ongoing Improvement Process

If non-compliant feed, raw materials and products are identified within the scope of internal audits, external audits or complaint management and/or lead to the identification of deviations from Standard requirements, the business must take 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.

## B 2.14 Documentation and Retention Period

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

All documents in connection with “VLOG geprüft”/“VLOG” transport, handling, (drop) shipping or “VLOG geprüft”/“VLOG” storage or labelling with the “VLOG geprüft”/“Ohne GenTechnik” seal must be retained for at least the following period of time, unless legal requirements provide for a longer retention period:

- minimum shelf life of the batch/lot plus one year, but not less than two years



*Explanation: Documents that must be retained are delivery slips/protocols, clearance certificates, training documents etc. In accordance with the [Guideline for Monitoring GMOs in Feed](#), feed related documents (regarding GMO) must be retained for five years.*

## B 2.15 Staff Training

All staff members involved in 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\\_training](https://www.ohnegentechnik.org/staff_training)*

## B 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 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 bagged goods the packaging are to be checked for the “VLOG geprüft” label and/or “VLOG geprüft” seal within the scope of incoming goods inspection. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.

#### **Food**

The bills of lading are to be checked for the “VLOG” label and/or “Ohne GenTechnik” seal within the scope of incoming goods inspection. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.

## **B 4 Specific Requirements for Trade**

### **B 4.1 Incoming Goods Inspection (KO)**

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

- the bills of lading or in the case of bagged goods the packaging must be checked for the “VLOG geprüft” label and/or the “VLOG geprüft” seal or “VLOG” label and/or the “Ohne GenTechnik” seal. A complaint is to be issued to the supplier for an incomplete or ambiguous bill of lading.
- the VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

### **B 4.2 Sampling and Testing**

Risk-based sampling and GMO testing of the feed and/or raw materials relevant for the “VLOG geprüft”/“VLOG” trade is to be performed 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. [Guideline for Laboratories](#))

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

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

### **B 4.2.2 Sampling and Commissioning a Laboratory**

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

- Compound feed: at least 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)
  - ground: at least 400 g, maximum 1 kg

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

**i** *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.*

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

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

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

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

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

### B 4.2.3 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 B 2 and Table B 3.

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

#### Trading of VLOG feed

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

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

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

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

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

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

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



*Explanation: The number of samples (raw materials/products) may be correspondingly reduced if the number of lots received in the audit period is smaller than the minimum number of samples listed in Table B3.*

**B 4.2.4 Evaluation of Test Results**

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

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

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

**Feed:**

Evaluation		Actions
<b>GMO not verifiable or &lt; 0.1%</b>		
Labelling compliant, permissible for VLOG-production		No action needed
<b>≥ 0.1 % ≤ 0.9 % GMO</b>		
Case-by-case evaluation	Can the GMO contamination be traced back to your own business? (e.g., dual use)	<p><u>Yes:</u> Check whether the actions taken (cf. Chapter B 2.4) are adequate and properly implemented.</p> <ul style="list-style-type: none"> <li>- If not, take further action in accordance with Chapters B 2.7 and B 2.12</li> </ul>

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

Evaluation		Actions
		<u>No</u> : Inform suppliers.
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	<u>Yes</u> : The actions taken (cf. Chapter B 2.4) are not adequate and must be revised.
		<u>No</u> : (No systemic cause): No action needed.
<b>&gt; 0.9 % GMO</b>		
Not labelling compliant, not permissible for VLOG production		Take further action in accordance with the procedures established in Chapters B 2.7 and B 2.12

Table B 4: Evaluation of test results for feed

**Food:**

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

Table B 5: Evaluation of test results for food

## B 5 Specific Requirements for Drop Shipping

### B 5.1 Incoming Goods Inspection (KO)

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

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

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

### B 6.1 Specific Requirements for Risk Management

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

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



*Explanation: To assist with the risk grading of feed, an “Assessment Aid – At Risk Feed” is available on the VLOG website: [https://www.ohnegentechnik.org/risk-prone\\_feed](https://www.ohnegentechnik.org/risk-prone_feed).*

### B 6.2 Incoming Goods Inspection

It must be ensured at goods receiving that only feed exempt from the labelling obligation is converted to “VLOG geprüft” quality.

#### Incoming goods inspection of risk prone feed

There must exist a confirmation from the supplier that all feed and feed additives classified by the business as risk-prone (cf. chapter B 6.1) are GMO-free or exempt from labelling. This can be achieved by:

- a separate declaration of the GMO-free status of the currently delivered batch/lot or
- a test result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered or
- an additional indication on the bills 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

For all feed and feed additives graded as non-risk-prone by the business (cf. Chapter B 2.4), the respective bills of lading for the feed need not be labelled under Regulation (EC) Nos. 1829/2003 and 1830/2003.

### B 6.3 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.

Each calendar year, the frequency of sampling and testing in the business must at least follow the specifications listed in Table B 6.

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

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

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



*Explanation: For the sampling of bagged goods within the scope of conversion the requirements for performing representative sampling from Regulation (EU) No. 691/2013 annex 1 apply.*

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

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

Contract manufacturers are monitored as follows:

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

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

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

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

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

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

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

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

- the bills of lading or in the case of bagged goods the packaging must be checked for the identification "VLOG geprüft" and/or the "VLOG geprüft" seal. A complaint is to be issued to the supplier for an incomplete or ambiguous labeling.

### **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.