



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

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

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## Part D - Matrix Organisation Logistics and Feed Manufacturing

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

### D 1 Stage Definition and Mandatory Certification

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

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

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

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

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

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

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

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

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

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

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

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

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

The matrix description must contain/provide at least:

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

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

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

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

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

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

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

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



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

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

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

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

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

### **Risk analysis**

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

The risk analysis at a minimum covers the following points:

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

### **Risk management**

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

At least once per calendar year, there must be a review of the risk management, including a review of the matrix description, e.g. as part of an internal audit.

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

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

- the external service provider is audited by the certification body in the course of the VLOG on-site audit of the client or

- the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent

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

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

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

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

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

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

## **D 2.6 Sampling and Testing**

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

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

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

- Determination of the risk-prone feed, raw materials and products to be sampled/tested based on the risk analysis to be carried out (cf. Chapter C 2.4)
- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing
- Description of the testing procedure (commissioned laboratory, scope of testing, cf. [Guideline for Laboratories](#))



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

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



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

## D 2.6.2 Sampling and Commissioning a laboratory

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

- 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 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.

**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.*

## D 2.6.3 Frequency of Sampling and Testing

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

## D 2.6.4 Evaluation of Test Results

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

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

- If the test results, including expanded measurement uncertainty, overlap, the mean value shall be calculated from the test results.



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

**Feed:**

Evaluation		Actions
<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)	<u>Yes</u> : Check whether the actions taken (cf. Chapter D 2.4/C 2.4) are adequate and properly implemented.  - If not, take further action in accordance with Chapters D 2.8 and D 2.11 (or corresponding chapter in part B or C).
		<u>No</u> : Inform suppliers.
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	<u>Yes</u> : The actions taken (cf. Chapter D 2.4/C 2.4) are not adequate and must be revised.
		<u>No</u> (No systemic cause): No action needed.
<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 D 2.8 and D 2.11 (or corresponding chapter in part B or C).

**Table D 2: Evaluation of test results for feed**

**Food:**

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

**Table D 3: Evaluation of test results for food****D 2.6.5 Evaluation of the analytical data**

The matrix organiser:

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

**D 2.7 Staff and Member Training**

All staff members of the matrix organiser involved in the operating procedures of relevance to "VLOG"/"VLOG geprüft" certification must be trained by the matrix organiser concerning the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Training is to take place before they begin with their activity, as well as on an ongoing basis, and at least once per calendar year. Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

The matrix organiser must communicate all relevant requirements and information on "VLOG"/"VLOG geprüft" production to the members. Communication of the information is to be documented.



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

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

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

- Clarification of whether an incident has occurred (cf. Chapter D 2.11)
- Labelling of affected feed, raw materials and products

- Notification of customers/buyers, suppliers and matrix member(s)
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

Test results are to be evaluated in accordance with Chapter D 2.6.4.



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

## D 2.9 Complaint Management

A documented system is to be introduced to 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 coordinated with the affected members and initiated for justified complaints and feedback.

### D 2.10 Goods Recall

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

### D 2.11 Crisis Management (KO)



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

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

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

- The steps to follow in the event of an incident
- Assigned persons in charge including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provisions requiring immediate notification of
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (see Annex (32))
  - the VLOG Head Office using the VLOG Incident Sheet (see Annex (32))

- Legal advice (if required)

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

## D 2.12 Corrective Action, Ongoing Improvement Process

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

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

## D 2.13 Documentation and Retention Periods

Records must be easily legible and authentic. Post factum manipulation is not allowed. All documents relating to the matrix certification and "VLOG geprüft"/"VLOG" labelling or labelling with "VLOG geprüft"/"Ohne GenTechnik" seal are to be retained for at least the following period, unless statutory provisions require a longer retention period: Five years.



*Explanation: Documents that must be retained are e.g. delivery slips, supplier evaluations, training documents, etc. In accordance with the Guideline for Monitoring GMOs in Feed, feed- (regarding GMO) related documents must be retained for five years.*

## D 2.14 Internal Audit

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

The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.