



“Ohne Gentechnik” Production and Certification Standard Part E - Agriculture

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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.

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: <https://www.ohnegentechnik.org/SRAE>.

	Certification required according to VLOG Standard	Approval by document check and/or registration	Standard requirements
Sub-stage of Animal production: The production of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.			
Primary production of food of animal origin (e.g. milk, meat, eggs, honey, fish...)	For any agricultural business that carries out primary production to be labelled as "Ohne Gentechnik" and whose "Ohne Gentechnik" production fulfils the following business sizes: <ul style="list-style-type: none"> • Apiary: ≥ 50 beehives • Egg-producing operations: ≥ 350 animal spaces • Milk production: annually ≥ 10 cows 	For any agricultural business that carries out primary production to be labelled as "Ohne Gentechnik" and whose "Ohne Gentechnik" production fulfils the following business sizes: <ul style="list-style-type: none"> • Apiary: < 50 beehives • Egg-producing operations: < 350 animal spaces • Milk production: annually < 10 cows <i>A document check is necessary.*</i>	E 1 - E 4
Rearing and sale of animals			
Pullets	For agricultural businesses that sell pullets to the aforementioned primary producers and whose	For agricultural businesses that sell pullets to the aforementioned primary producers and whose	E 1 - E 4

	<p>“Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:</p> <ul style="list-style-type: none"> • Rearing of laying hens: ≥ 700 animal spaces 	<p>“Ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:</p> <ul style="list-style-type: none"> • Rearing of laying hens: < 700 animal spaces <p><i>A document check is necessary.*</i></p>	
Piglets	<p>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:</p> <ul style="list-style-type: none"> • The facility is not registered with VLOG as a piglet rearing facility <u>and</u> • business fulfils the following business size: ≥ 250 animal spaces for piglets under 30 kg 	<p>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:</p> <ul style="list-style-type: none"> • < 250 animal spaces for piglets under 30 kg <p><i>A document check is necessary.*</i></p>	E 1 - E 4
		<p>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:</p> <ul style="list-style-type: none"> • The facility is not registered with VLOG as a piglet rearing facility <p><i>Please contact the VLOG head office for information regarding registration.</i></p>	E 1 - E 4

* 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-based production: The cultivation of primary products, including harvesting and foraging.			
Cultivation of feed	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.	In EU countries in which the cultivation and the release of genetically modified plants for research purposes is prohibited by law.	E 1-E 3, E 5
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		E 1-E 3, E 6
	For commercial animal transport of VLOG animals, provided that least one of the following three requirements is fulfilled: <ul style="list-style-type: none"> • <u>No</u> commissioning by a VLOG certified business. • Transport is <u>not</u> integrated into the risk management of the VLOG certified business. 	For commercial animal transport, provided that all of the following three conditions are met: <ul style="list-style-type: none"> • Commissioning by a VLOG certified business. • Transport is integrated into the risk management of the VLOG certified business. • An agreement is in effect between the carrier and the certified business regarding 	E 1-E 3, E 6

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	<ul style="list-style-type: none"> There is <u>no</u> agreement in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard. 	compliance with the requirements of the VLOG Standard.	
		Trade and commercial transport of animals which have not yet begun the minimum feeding conversion period.	E 1-E 3, E 6

Table E 1: Stage Definition and Mandatory Certification

E 2 Criteria for Risk Grading

i 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.

Grading a business with various areas of application (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:
 - 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	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site. Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit. 	<p>Feed subject to compulsory labelling, which can be swapped, is present at the site.</p> <p>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.</p>	<p>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 site¹.</p>
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn	<p>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.</p>		<p>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).</p>
Certification status of risk-prone feed in VLOG production (cf. Chapter E 4.2)	<p>Risk-prone feed and the feed supplier (excluding cf. Chapters B 1, C 1) must be certified pursuant to the VLOG Standard or a standard recognised as</p>		<p>Risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.</p>

¹ 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
	<p>equivalent. This also applies to oils used for dust binding in grinding and mixing facilities.</p>		<p>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).</p>
<p>Use of grinding and/or mixing facilities</p>	<p>Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard.</p> <p>Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.</p>	<p>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.</p> <p>Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:</p> <ul style="list-style-type: none"> • The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio²). • Measures to prevent contaminations with GMO are described in the QM manual of the facility operator. 	<p>Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard.</p> <p>Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not.</p> <p>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).</p>

² 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
Livestock transport/livestock trade	The animals are not fed in the business, during transport, trans-shipment and rest periods.	The animals are fed in the business, during transport, trans-shipment and rest periods. In this case, the other risk-grading criteria in this table also apply.	

Table E 2: Criteria for Risk grading

E 3 General Requirements

E 3.1 Standard Usage Agreement with VLOG

For individually certified businesses there must be a Standard Usage Agreement with VLOG signed by both parties, including the VLOG ID (10-xxxxx/80-xxxxx) issued by VLOG.

E 3.2 Facility Description

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

The certification body or the group 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 and test results 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.*

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.*

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.

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.*

In the case of small operations³, this may be done as part of the facility description.

³ For definition see Glossary

E 3.4 Risk management

i *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
- Contamination by third parties
- 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

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

- 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

i *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)
- 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.

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.

i *Explanation: Food which has already been marketed (e.g. milk with "Ohne Gentechnik" labelling) needs not be recalled.*

i *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*

i *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: https://www.ohnegentechnik.org/GGSC_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

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 deal with complaints, feedback and comments 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)

i *Explanation: Incidents are defined on the incident sheet (cf. Annex (33)).*

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))
 - 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.

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.

i Explanation: For small agricultural businesses (see Glossary), there is no need for separate “VLOG” training for employees.

i Explanation: 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.

i Explanation: A form to confirm VLOG staff training is available at the following link (use of the template is voluntary): https://www.ohne Gentechnik.org/staff_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.

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

Risk-prone	Not risk-prone
	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, 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	<u>Feed material</u> from maize/corn that directly originates from a producer from Bulgaria, Denmark, Germany, France, Greece, Italy, Croatia,

Risk-prone	Not risk-prone
<p>compound feed that contains maize/corn or was made from it.</p>	<p>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.</p> <p>Dried maize/corn kernels if the following two conditions are met:</p> <ul style="list-style-type: none"> • verified cultivation of the maize/corn in the aforementioned countries • Purchase made directly from a drying facility that only dries goods not subject to labelling and maize/corn from the aforementioned countries. A written confirmation is available. <p>Maize/corn silage or silage maize/corn if the following two conditions are met:</p> <ul style="list-style-type: none"> • verified cultivation of the maize/corn in the aforementioned countries • Purchased utilising one of the following three options: <ul style="list-style-type: none"> – drop shipper with transport directly from the producer to the customer without intermediate storage – Trader: <ul style="list-style-type: none"> ○ only stores/trans-ships silage corn/maize or maize/corn silage from the aforementioned countries OR ○ only trades producer-wrapped/shrink wrapped silage with delivery to the customer in this packaging <p>A batch-specific certificate of origin/declaration by the drop shipper, trader or producer must be on file.</p>
Sugar Beets	
<p>Feed material from sugar beets and compound feed that contains sugar beets or was made from them.</p>	<p>Feed material from sugar beets and compound feed that contains sugar beets or was made from them in compliance with the following conditions:</p> <ul style="list-style-type: none"> • 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

i *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.*

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

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

i *Explanation: For small businesses⁴, a chronologically filed collection of invoices and bills of lading is an alternative to a feed list.*

E 4.5 Feed Rations

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

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. The 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 and/or "VLOG geprüft" seal. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.

⁴ See Glossary

- 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 and/or “VLOG geprüft” seal. A complaint is to be issued to the supplier for a incomplete or ambiguous bills of lading.
- 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 bills of lading to be duly checked is listed in the following document: <https://www.ohnegentechnik.org/SRAE>.

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.

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 ⁵	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

⁵ 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.

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 Receipt of animals (KO)

The minimum feeding conversion period with “Ohne Gentechnik” compliant feed begins with the purchase of animals or the return of outsourced animals in the VLOG operating unit.

The “Ohne Gentechnik” compliant feeding period of the rearing facility/previous owner/outsourcing facility can be counted towards the minimum feeding conversion period. For this, the conditions set forth in Table E 5 must be met and the required proof must be available.

Species/categories of incoming animals	Conditions for taking VLOG compliant feeding by the rearing facility/previous owner/outsourcing facility into account	Required proof
Dairy cattle: All animal categories (e.g. milk cows, gestating cows, heifers, young cattle, bulls)	Annex (2)	
Fattening cattle: All cattle fattening categories	Annex (2)	
Sheep and goats	Annex (2)	
Pullets	The pullet rearing facility <ul style="list-style-type: none"> • is itself VLOG-certified or • is certified according to a standard recognised as equivalent or • is currently included in a VLOG group 	<ul style="list-style-type: none"> • VLOG-certificate or • certificate under a standard recognised as equivalent or • current proof of inclusion in a VLOG group and written confirmation of the start of the minimum feeding conversion period (e.g. via Annex (2) or on the delivery slip)
Piglets	The piglet rearing facility: <ul style="list-style-type: none"> • is itself VLOG-certified or • certified according to a standard recognised as equivalent or • currently included in a VLOG group • or • VLOG-registered 	<ul style="list-style-type: none"> • VLOG-certificate or • certificate under a standard recognised as equivalent or • current proof of inclusion in a VLOG group or • a VLOG registration certificate and • written confirmation of the start of the minimum

Species/categories of incoming animals	Conditions for taking VLOG compliant feeding by the rearing facility/previous owner/outsourcing facility into account	Required proof
		feeding conversion period (e.g. via Annex (2) or on the delivery slip)
Other relevant species/categories of animals, e.g. bees, farmed game, rabbits	Annex (2)	

Table E 5: Conditions for taking the "Ohne Gentechnik" compliant feeding period of the rearing facility/previous owner into account for the minimum feeding conversion period



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 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*

Incoming goods inspection upon the purchase or return of VLOG animals:

- At the incoming goods stage, the bills of lading are to be checked for the "VLOG" label and/or the "Ohne GenTechnik" seal. A complaint shall be made to the supplier regarding any incomplete or ambiguous bills of lading.
 - Cattle: If the minimum feeding conversion period for the animal has not been completed for all areas of application, the information regarding the start of the minimum feeding conversion period must also be checked.
- The certification status of the rearing facility/previous owner/outsourcing facility (VLOG certification or certification recognised as equivalent or inclusion in a VLOG group) shall be checked as of the purchase date/return date or, if there are regular purchases/returns of animals, on a regular basis, but at least once per calendar year.

E 4.9 Segregation of Goods Flows, Exclusion of Contamination (KO)

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.

Feed of different qualities:

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

- 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:
 - 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 cleaned after having transported bulk feed subject to compulsory labelling.

- additionally, in the case of temporal segregation:
 - 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)
- swappable 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:

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

- 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:
 - 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
 - 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

E 4.10 Use of Grinding and Mixing Facilities

E 4.10.1 Whereabouts of System Purges

System purges must not be used in VLOG production. The whereabouts of system purges must be documented.

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.

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:

- 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):
 - 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

E 4.10.2.2 Grinding and Mixing Protocol

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 Exclusively for Feed Not Subject to Compulsory Labelling

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

E 4.10.3.2 Use for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling

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
- 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
- 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

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.

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)

i *Explanation: Sampling and GMO testing are not necessary if the risk-prone feed cannot be analysed for genetic engineering for technical reasons. The VLOG homepage offers an assessment aid on the suitability of feed for testing: https://www.ohnegentechnik.org/gmo_testing_suitability.*

E 4.11.2 Sampling, Retention of Reference Samples

Sampling frequency:

Sampling must take place in the following cases:

- at every delivery of risk-prone feed material and compound feed (cf. Chapter E 4.2)
- when using a stationary or mobile grinding and mixing facility in accordance with the guidelines in Table E 6
- after each switch to “Ohne Gentechnik”-compliant feeding, if there is a regular alternation between “Ohne Gentechnik”-compliant feeding and feeding with feed subject to mandatory labelling (e.g., turkey fattening) in a VLOG stable or associated feeding facility. The relevant sample must be taken at the start of the minimum feeding conversion period at the site of the feeding rack (e.g., the feeding trough).

i *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:

- 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.*

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 categories⁶, at least the three most recent reference samples must always be retained, even if they are more than two months old.

⁶ Delivery of risk-prone feed; switch between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling

E 4.11.3 Commissioning a 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 Guideline for Laboratories](#) 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).

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 and also
- after every 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.
 - VLOG-operating units/VLOG stables are exempted if a documented wet cleaning of the stable and the feeding equipment (including silo) is carried out before “Ohne Gentechnik” compliant feeding

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.

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-certified⁷	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	One sample + one test per audit interval and facility	Sampling + testing not required
Facility also processes feed subject to compulsory labelling	Sampling + testing not required		One test 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.

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-by-case evaluation	Can the GMO contamination be traced back to your production system?	<u>Yes</u> : Check whether the actions taken (cf. Chapter E 3.4) are adequate and properly implemented.

⁷ Or in accordance with a recognised VLOG-equivalent standard

	(e.g. dual production or change of feed)	If not, continue in accordance with the procedure established in Chapters E 3.6 and E 3.9.
		<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 E 3.4) are not adequate and must be revised.
		<u>No</u> : (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 4.12 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 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.

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 for internal farming purposes are exempt from labelling under Directive 98/95/EC.

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

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

E 5.2 Segregation of Goods Flows/Exclusion of Contamination (KO)

GMO 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.

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.

E 6.1 Animal Transport Overview

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)

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

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

E 6.3.2 Feeding of Animals

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

- 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.