



“Ohne Gentechnik” Production and Certification Standard

Part H - Retail - Sale of Bulk Food of Animal Origin

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Contents

- Contents..... 1
- List of Tables and Images..... 1
- Part H - Retail Stage - Sale of Bulk Food of Animal Origin 2
- H 1 Stage Definition and Mandatory Certification..... 2
- H 2 Requirements for Group Organisers and Group Members..... 3
- H 2.1 Standard Usage Agreement with VLOG..... 3
- H 2.2 Group description and members list 3
- H 2.2.1 Group Description (see Annex (27)) 3
- H 2.2.2 Members list..... 4
- H 2.3 Contractual Binding of the Group Members (KO)..... 4
- H 2.4 Risk Management (KO) 4
- H 2.5 Approval of Suppliers and Articles..... 5
- H 2.6 Incoming Goods Inspection (KO)..... 5
- H 2.7 Segregation of Goods Flows/Exclusion of Contamination (KO) 5
- H 2.8 Processing..... 6
- H 2.9 Training of Staff and Group Members 6
- H 2.10 Handling of Non-compliant Raw Materials/Products (KO) 6
- H 2.11 Labelling..... 7
- H 2.12 Traceability (KO)..... 7
- H 2.13 Crisis Management (KO)..... 7
- H 2.14 Corrective Action, Ongoing Improvement Process..... 8
- H 2.15 Documentation and Retention Periods 8
- H 2.16 Internal Audits..... 8

List of Tables and Images

- Table H 1: Stage Definition and Mandatory Certification 2

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

In this section the requirements for the Retail Stage - sale of bulk food of animal origin in retail is described, the certification of which is done within the scope of retail group certification. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

H 1 Stage Definition and Mandatory Certification

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Retail: Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.			
VLOG retail group: A VLOG retail group is a combination of branch operations (the so-called retail group members) for the purpose of VLOG group certification in retail.			
Retail group organiser, hereinafter group organiser: Business in a VLOG retail group having responsibility for a risk management that includes the retail group members. In VLOG retail group certification, certification is to be issued through the retail group organiser, i.e. the group organiser receives the certification for the VLOG retail group.			
Retail group member, hereinafter group member: Branch/site contractually integrated into a VLOG group.			
	For bulk goods of animal origin at a central distribution facility and counter sales, labelled with the "Ohne GenTechnik" seal	No relevant areas	H 1 - H 2

Table H 1: Stage Definition and Mandatory Certification

H 2 Requirements for Group Organisers and Group Members

H 2.1 Standard Usage Agreement with VLOG

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

H 2.2 Group description and members list

H 2.2.1 Group Description (see Annex (27))

The group organiser must submit a current group description to the certification body. The group organiser must promptly notify the certification body of major changes in the group description pertaining to VLOG certification.

The group description must contain/provide at least:

- An organisational chart of the business including details of responsibilities and a deputy plan to cover for absences for the operating procedure relevant to "VLOG"
- Persons in charge of the group organisation at the group organiser, including the persons' contact information and provisions regarding deputies
- Member list: A list and description of the activities of the retail group members with information about whether the purchase of "Ohne Gentechnik"/"VLOG" food is centralised or decentralised
- Information on whether traceability can be ensured up until sale to the customer or up until the service counter¹
- A list and description of the outsourced processes (e.g. external service/job order production), which are integrated into the VLOG group, including the persons in charge and their contact data
- A list of all areas for which the group organiser is responsible (e.g. *risk management, crisis management, etc.*)
- List of all authorised suppliers of "Ohne Gentechnik"/"VLOG" food and ingredients
- If applicable, if multiple certification bodies have been engaged, the group organiser must describe the scope of certification of the various certification bodies (e.g. which certification body will audit which group members)



Explanation: The designation of responsibilities within the organisational chart, within the branches may be linked to functions/job descriptions.

If the VLOG retail group establishes a central sales concept for all branches which is implemented in an identical manner by all the branches, it is sufficient if a single description of the group is prepared.

¹ If, for example, counter staff make incorrect PLU entries at checkout at a particular branch, traceability can only be ensured up until the service counter.

Deviating characteristics of individual branches are to be documented correspondingly in the group description.

The documents to be submitted to the auditor can be made available electronically. At the request of the business, all documentation other than the product and member list may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents.

H 2.2.2 Members list

A complete and up-to-date members list must be available.

A list of products, i.e. an overview or specifications, if applicable, for bulk "Ohne Gentechnik" goods offered by the business, including consideration of re-working, is to be on file for each member.

For further processing or the use of further ingredients (e.g. marinades, mixed spices) a list of all formulations with quantity- or weight-related information on ingredients and components is to be on file for each member, including consideration of re-work.

The group organiser must immediately notify the certification body of changes to the members list.



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

H 2.3 Contractual Binding of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract/participation statement. The contract must contain at least the following items:

- Compliance with the VLOG Standard
- Implementation of the established corrective measures by the member within the established time periods

H 2.4 Risk Management (KO)

Risk analysis

A documented risk analysis is to be submitted for all relevant raw materials, products, procedures and processes for which the group organiser is responsible. This must include evaluation of the risks for "Ohne Gentechnik" labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and products for the "Ohne Gentechnik"/"VLOG" area
- Handling of raw materials and products that meet the requirements for "Ohne Gentechnik"/"VLOG" labelling, and raw materials and products that do not meet the requirements for "Ohne Gentechnik"/"VLOG" labelling
- Cleaning and disinfection procedure
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Sales/Declaration
- Other business-specific items if necessary

Risk management

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

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

H 2.5 Approval of Suppliers and Articles

A system must be in place for approval of suppliers and articles. The ordering of bulk and packaged "Ohne Gentechnik"/"VLOG" goods is to be transparent.

For bulk "Ohne Gentechnik"/"VLOG" goods, the following documents are to be available:

- List of suppliers
- List of products
- Lists of raw materials and specifications

There must be a documented procedure for clearing formulas and formula changes.

H 2.6 Incoming Goods Inspection (KO)

With regard to incoming goods, it must be ensured that all "Ohne Gentechnik"/"VLOG" raw materials and products meet the VLOG requirements (see Chapter A 8).

- The bills of lading or in the case of bagged goods the packaging 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.
- The Supplier's certification is to be checked.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.
- For non-VLOG-certified raw materials of non-animal origin, there must exist a certificate from the supplier stating that such raw materials are GMO-free in accordance with Annex (1).

H 2.7 Segregation of Goods Flows/Exclusion of Contamination (KO)

Physical and/or temporal segregation of the goods flows must guarantee that at no time products not suitable for "VLOG" labelling or labelling with the "Ohne GenTechnik" seal come into contact with the goods flows of products destined for "VLOG" labelling or labelling with the "Ohne GenTechnik" seal. Where necessary, interim cleaning must be performed.

In addition, all raw materials/semi-finished products/finished products must be clearly and consistently labelled on all process steps. This applies, in particular, when goods are sent from the central office to the individual branches. In this case, "VLOG" goods must be clearly identifiable as such.

i *Explanation: The goods must be segregated physically (e.g. using shelves, crates, or trays) during storage, handling, and presentation/sale, as well as through clear and seamless labelling of the "Ohne Gentechnik"/"VLOG" raw materials/semi-finished products/finished products.*

Joint storage of bulk "Ohne Gentechnik"/"VLOG" goods with bulk goods not suitable for "Ohne Gentechnik" labelling is not permitted. Clear segregation, e.g. using different containers, is mandatory.

All reusable devices and containers used for the processing, presentation and storage of "Ohne Gentechnik"/"VLOG" products must be prepared prior to being used for "Ohne Gentechnik"/"VLOG" products such that the possibility of commingling is excluded.

H 2.8 Processing

Binding formulations, stating quantities and weights, are to be documented for all self-processed "Ohne Gentechnik"/"VLOG" products.

The formulations only contain ingredients that meet the requirements for the production of "Ohne Gentechnik" products in accordance with the VLOG Standard.

H 2.9 Training of Staff and Group Members

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

The group organiser transmits to the group members all relevant requirements and information related to VLOG production. Communication of the information is to be documented.

i *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.*

H 2.10 Handling of Non-compliant Raw Materials/Products (KO)

An effective and documented procedure for handling non-compliant raw materials/products must be in place.

At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter H 2.13)
- Labelling of affected raw materials and products
- Notification of the suppliers and group organiser and/or group member
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

H 2.11 Labelling

Only price tags or labels of products that meet the requirements of the VLOG Standard may be marked as "Ohne Gentechnik" or with the "Ohne GenTechnik" seal.

H 2.12 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All "Ohne Gentechnik"/"VLOG" raw materials and products present in the business can be clearly identified at all times
- The goods flow of "Ohne Gentechnik"/"VLOG" raw materials and products as well as quantity lists and evaluations can be generated within one working day to allow for conclusions about the plausibility of goods flows



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

- Information on supplier and delivery date
- Quantity
- Creation of batches, if applicable (including re-working)
- Information on delivery date and supplied customers²

The sale, refinement, write-offs, and inventory adjustments of bulk "Ohne Gentechnik"/"VLOG" goods must be documented in the business item by item and with traceable and verifiable quantity information. The labelling system must be defined and clearly recognisable.

H 2.13 Crisis Management (KO)



Explanation: Incidents are defined on the incident sheet (cf. Annex (35)).

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

A current documented procedure has been introduced for the management of incidents that may lead to a crisis situation. This includes, in particular, incidents that affect the product quality and legitimacy of "Ohne Gentechnik"/"VLOG" raw materials/products. This procedure is to be implemented, must take into account all branches, and has to comprise, at a minimum:

- The steps to follow in the event of an incident
- Assigned persons in charge including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Regulation for the immediate notification of:
 - the certification body using the VLOG Incident Sheet (cf. Annex (35))

² If, for systemic reasons, traceability can only be ensured up until the service counter and not up until sale to the customer (e.g., due to incorrect PLU entries by counter personnel), 10% of the branches will be audited unannounced each calendar year.

- the VLOG head office using the VLOG Incident Sheet (cf. Annex (35))
- Legal advice (if required)

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

H 2.14 Corrective Action, Ongoing Improvement Process

If non-compliant products are identified within the scope of internal audits, external audits or complaint management, and/or lead to the identification of deviations from Standard requirements, the business must take and document corrective actions to prevent their reoccurrence.

The group organiser is responsible for the timely implementation of corrective actions by the group members. Their effectiveness is reviewed within a reasonable period. Both are to be documented.

H 2.15 Documentation and Retention Periods

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

All documents relating to the "Ohne Gentechnik"/"VLOG" labelling are to be retained for at least the following period, unless statutory provisions require a longer retention period: two years.



Explanation: Documents that must be retained include bills of lading, supplier declarations, records of product and goods flows (incl. rework), training documents, etc.

H 2.16 Internal Audits

Each calendar year, the group organiser must perform an internal audit in the business of the group organiser and all branches respectively. These audits must cover all requirements according to the Standard for the Retail Stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.

In the scope of the internal audit, at least two risk-based random sample checks are to be performed each calendar year for goods tracing, incl. quantity comparison, and the results are documented. Compound food products are also taken into account, if produced by the business or at its branches.

The following additional points are to be checked:

- "Ohne Gentechnik"/"VLOG" labelling in the business
- Currentness and implementation of process and work instructions