

# "Ohne Gentechnik" Production and Certification Standard

# **Version 25.01**

Published on 1 September 2024 Obligatory as of 1 January 2025



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## Part A - General

## A 1 Preamble

The VLOG "Ohne Gentechnik" Production and Certification Standard consists of several parts. Part A of the VLOG Standard, the General Part, describes the structure of the VLOG Standard, the principal legal basis for "Ohne Gentechnik" labelling as well as the VLOG auditing system. The use of the "VLOG geprüft" and "Ohne GenTechnik" seals is also explained.

# A 2 Introduction

The German EC Genetic Engineering Implementation Act (EGGenTDurchfG) has been in force since May 2008 which is the legal basis for the "Ohne Gentechnik" label. It governs the labelling of food which has been produced without the "use of genetic engineering processes". Only the designation "ohne Gentechnik" may be used to indicate that a food product advertised or distributed on the German market was produced without the use of genetic engineering.

# A 3 VLOG as Standard-Issuing Body

In 2010, a working group of interested companies formally established the German Association Food without Genetic Engineering (VLOG) from among its members. VLOG offers a platform for the exchange of information, knowledge and experience in connection with the manufacture and marketing of "Ohne Gentechnik" food and represents the interests of its members.

# A 4 Purpose

The VLOG Standard details the requirements for "VLOG geprüft" feed or "ohne Gentechnik" food production and is designed to harmonise the review of process and quality assurance systems. The cross-stage certification obligation and the traceability requirement safeguard the entire production chain from "VLOG geprüft" feed manufacturing through "VLOG" food-processing.

A certification according to this Standard serves as the basis for issuance by VLOG of a licence to use the "Ohne GenTechnik" and "VLOG geprüft" seals.

# A 5 Scope of Application

The present Standard forms the basis for certification for the stages mentioned in A 6 along with associated services and activities in the EU. The VLOG Standard and the EGGenTDurchfG are based on the labelling provisions of Regulations (EC) 1829/2003 and 1830/2003 and therefore may not be applied on an analogue basis outside of the EU. Businesses outside the EU may be certified only after approval by VLOG. The VLOG Standard has been drafted in the German language and translated into English. If there are discrepancies between the translation and the German version, the German original shall prevail.

# A 6 Structure

The VLOG Standard is divided into several parts (A-H and Z). The stages and sub-stages in the production chain for which the VLOG Standard lays down requirements are defined in Figure A 1. The figure also explains which parts apply to the various businesses, activities and services. The regulations regarding the certification obligation may be found at the beginning of the stage-specific Parts B to H of the Standard.

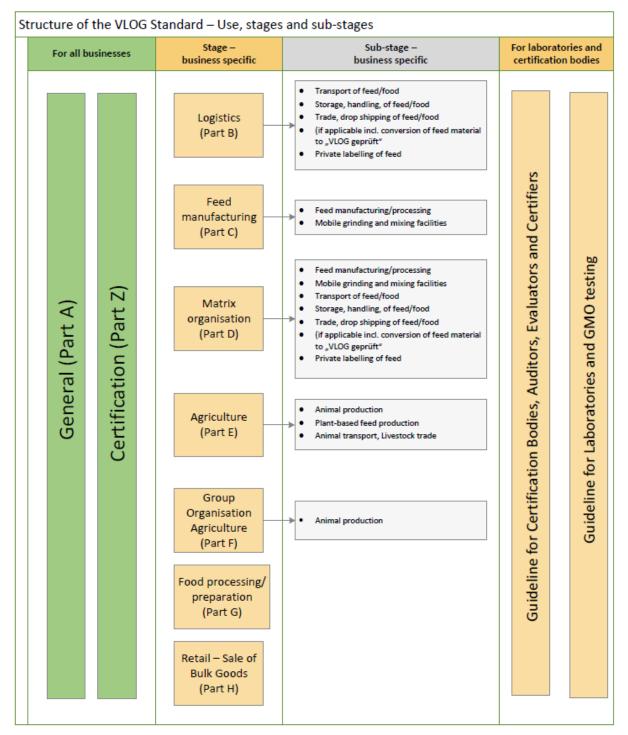


Figure A 1: Structure of the VLOG Standard

# A 7 Review of the VLOG Standard

The VLOG Standard is reviewed, revised and supplemented on a regular basis. The VLOG Board of Directors is advised in this regard by the Standard Technical Working Group. In order to enable information about the upstream and downstream areas of food production to be incorporated into the Standard, relevant sectors are represented in the Standard Technical Working Group. The VLOG Board of Directors appoints the members of the Standard Technical Working Group.

# A 8 Legal Basis and Interpretation

The following legal regulations and interpretations constitute the basis of the present Standard:

- Regulations (EC) No. 1829/2003 and 1830/2003
- EC Genetic Engineering Implementation Act (in short: EGGenTDurchfG)
- Guidelines for controlling GMOs in feed, version 3 (as of 15 July 2021): Guidelines for monitoring the production, handling, use and placing on the market of feed in connection with genetically modified organisms (GMO), developed by the GMOs in Feed Project Group (PG GVO) of the Agricultural Employers Association (LAV) Working Group on Feed, with the participation of the German Federal Government and the PCR Working Group of the Feed Expert Group of the Association of German Agricultural Investigation and Research Institutions (VDLUFA) (in short: Feed Guideline)
- Statement no. 2016/01: <u>Guidelines for controlling genetic modifications in food products</u> orientation framework for applying the legal regulations and for controlling genetic modifications in food products of 30 March 2022 (developed by the ALS working group Monitoring of GMO Food Products, in short: Food Guideline)
- Additional interpretations of the legal regulations by the VLOG managing office may be found at: <u>https://www.ohnegentechnik.org/en/faq</u> or <u>https://www.ohnegentechnik.org/en/download-center</u>

The following legal provisions and interpretations are considered to be requirements and rules with respect to or for the users of the VLOG Standard (VLOG-certified businesses, VLOG-recognised laboratories and certification bodies).

### A 8.1 Basic Requirements for Food and Feed

A basic requirement regarding feed and food raw materials for the production of food labelled "ohne Gentechnik" is that they be exempt from labelling as "genetically modified" according to the requirements of Regulations (EC) No. 1829/2003 and No. 1830/2003.

Contamination with GMOs permitted in the EU are exempt from labelling obligations as "genetically modified" according to Art. 12 (2) or Art. 24 (2) Regulation (EC) No. 1829/2003 and Art. 4 (8) as well as Art. 5 (4) Regulation (EC) No. 1830/2003 if the following two requirements are fulfilled:

- The threshold value of the GMO content of 0.9 % per feed material/ingredient is not exceeded and
- The presence of the GMO content is "adventitious or technically unavoidable"

### A 8.2 Specific Requirements for Feed

#### "Adventitious or technically unavoidable"

According to the VLOG Standard, contaminations with admissible GMO content < 0.1 % are generally considered as "adventitious" or "technically unavoidable".

According to the Feed Guideline, the assessment of whether a detected contamination is adventitious or technically unavoidable should always be preceded by a case-by-case examination. The following criteria must be examined depending on the individual case:

- Under Art. 24 (3) of Regulation (EC) No. 1829/2003, the business must verifiably have taken appropriate steps to avoid the presence of GMO components (according to Art. 24 (2) of Regulation (EC) No. 1829/2003). The business bears the burden of proof in this regard.
- A feed business that manufactures, uses or handles both GMO-containing feed and non-GMO feed must spatially or temporally separate the two product lines to avoid contamination. In the case of temporal separation, the entry of GMOs or products made from them must be prevented to the extent possible, e.g., through system purges and/or appropriate cleaning of the system. Proof of the suitability of the measures and their implementation is the responsibility of the business, particularly through self-monitoring.
- In the case of feed deliveries from third countries where there is no comparable labelling system, the business must contractually agree to the requirements, and this must be safeguarded by certificates and self-monitoring.
- If feed in which GMO components cannot be excluded is delivered in relevant quantities, it is reasonable and necessary to ask the supplier whether protective measures were taken to avoid the carryover of GMO components and, if so, which measures.
- When repeated audits of a facility regularly detect GMO components within a certain range below the threshold for labelling, this generally does not justify a conclusion by the feed business that the contamination is adventitious or technically and therefore labelling can be omitted in all cases. A reasonable duty of care within the business's own sphere of responsibility includes, e.g., measures to avoid carryover, checking delivered goods and placing obligations on sub-suppliers.

To determine as of what level feed is subject to compulsory labelling within the meaning of Regulations (EC) No. 1829/2003 and 1830/2003, please consult in particular Part 5 and Annexes 1 and 2 of the Feed Guideline.

Carryover of GMO material during the production process in a feed plant may not be considered as botanical contamination with the resulting labelling requirements.

#### Feed in "Ohne Gentechnik" production

Under the EC Genetic Engineering Implementation Act (EGGenTDurchfG), no feed may be used in the "Ohne Gentechnik" production system during defined minimum feeding conversion periods before the raw materials/products are arrived at:

- if the feed is labelled as "genetically modified" under Regulation (EC) No. 1829/2003 or No. 1830/2003 or is subject to a labelling obligation under Regulation (EC) No. 1829/2003 or No. 1830/2003 or
- would have to be labelled if it was placed on the market or
- for which there is no marketing authorisation under Regulation No. 1829/2003.

Feed additives must be taken into consideration for the labelling as "genetically modified" only if

• they are made from GMOs or GMO components and therefore must be labelled as "genetically modified" themselves.

According to the existing legal provisions, any feed additives that are produced by or with the help of GMOs need not be labelled and may be used without restrictions.

### A 8.3 Specific Requirements for Food

The requirements for raw materials to qualify for "ohne Gentechnik" go significantly beyond the absence of a labelling obligation according to Regulations (EC) No. 1829/2003 and No. 1830/2003.

Under the EC Genetic Engineering Implementation Act (EGGenTDurchfG), ingredients and additives for the production and manufacture of "Ohne Gentechnik" food:

- may not be GMOs
- may not contain GMOs and
- may not be produced from or by GMOs.

In general, adventitious or technically unavoidable traces of genetically modified material are tolerated up to a threshold of at most 0.1 % per ingredient.

The following applies to processing aids and other substances:

• Production by GMOs is precluded

# A 8.4 Additional Requirements for Processing Aids and other Substances

According to the VLOG Standard, the following additional requirements apply to processing aids and other substances, in addition to statutory principles and interpretations:

For the production/processing of VLOG products, no processing aids or other substances within the meaning of Sec. 3a (5), EGGenTDurchfG may be used which contain, consist of, or are produced from GMOs labelled in accordance with Regulation (EC) 1829/2003 or 1830/2003, or which would have to be so labelled were they placed into circulation.

# A 9 Auditing System

The VLOG auditing system consists of self-monitoring by the business, independent audits by VLOG-recognised certification bodies and audits under the VLOG Integrity Programme.

### A 9.1 Self-Monitoring by the Business

VLOG-certified businesses must perform self-monitoring and (review) risk grading based on stagespecific parts (B-H). The basis for this is the creation and review of a facility, matrix or group description.

### A 9.2 Independent Audits

VLOG-recognised certification bodies regularly conduct risk-based independent audits of the business to check compliance with stage-specific requirements (Parts B-H). In this regard, the Standard distinguishes between:

- Individual certification
- Matrix certification for logistics and feed manufacturing (for associated businesses/sites in the areas of logistics and feed manufacturing)
- Group certification in agriculture (for associated agricultural businesses)
- Group certification in retail (for associated branch operations)

The rules for independent audits are described in Part Z: Certification.

### A 9.3 Integrity Audits

As part of the Integrity Programme to ensure quality and the correct implementation of the VLOG standard, VLOG carries out the following activities:

- verification audits, including sampling, if necessary, of licensees and VLOG-certified businesses (including group or matrix members),
- certification body audits of certification bodies and
- laboratory audits of laboratories

The selection is performed, among others, in a risk-based manner or by reason of suspicious factors. Compliance with Standard requirements is verified as part of onsite inspections of all system participants.

Verification audits may be performed with and without advance notice.

Apart from ensuring quality and proper implementation of the VLOG Standard, Integrity Audits serve to further develop the VLOG system.

# A 10 Labelling, Use of the Seal

Any business that meets the statutory prerequisites of the EGGenTDurchfG may label its products in Germany with the words "Ohne Gentechnik". In this case, Sec. 3a and Sec. 3b of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) apply. However, the use of the unitary "Ohne GenTechnik" seal (cf. Figure A 2) must be requested from VLOG (cf. Chapter A 10.1).

### A 10.1 "Ohne GenTechnik" Seal and word mark "VLOG"

Food may be labelled with the uniform "Ohne GenTechnik" seal (cf. Figure A 2) or with the word mark "VLOG". The "Ohne GenTechnik"-seal was initiated by the Federal Ministry of Food and Agriculture (BMEL).

Meanwhile, VLOG is the holder of the trademark rights and is exclusively responsible for awarding and administration of the seal. Thus, the use of the "Ohne GenTechnik" seal for labelling and advertising of food is only permitted upon the approval of VLOG. It is regulated in a licence agreement between the licensee and VLOG. The prerequisite for this agreement is a certification according with the VLOG standard or a standard recognised as equivalent.

In contrast, the Standard Usage Agreement concluded with VLOG as the holder of the trademark rights governs the use of the word mark "VLOG" for food or animals.



Figure A 2: "Ohne GenTechnik" seal for food

### A 10.2 "VLOG geprüft" Seal and Word Mark

In order to explicitly indicate on the package and/or the bill of lading accompanying a VLOG-certified feed shipment the absence of the obligation to label the product in accordance with Regulations (EC) No. 1829/2003 and No. 1830/2003 – and thus its suitability for "ohne Gentechnik" food production – binding labelling with the word mark "VLOG geprüft" or, alternatively, with the word/design mark (seal cf. Figure Figure A) "VLOG geprüft" is required for VLOG-certified feed (cf. Chap. B 2.8 or C 3.3).

The Standard Usage Agreement concluded with VLOG as the holder of trademark rights governs the use of the word mark.

When using the word mark, care must be taken to avoid any resemblance of its visual representation to the "VLOG geprüft" seal.

To use the "VLOG geprüft" seal a licence agreement must additionally be concluded with VLOG. The basis for this licence agreement is a certification according with the VLOG Standard or a standard recognised as equivalent.



Figure A 3: "VLOG geprüft" seal for feed

## **Glossary - Definitions of terms**

The following definitions and abbreviations are used for the terms utilised in the VLOG Standard:

**Animal category:** Animals which fundamentally differ in their husbandry conditions are regarded as different animal categories (e.g. breeding pigs/fattening pigs, laying hens/chickens for fattening, heavy livestock/dairy cattle).

**Animal production:** The production or rearing of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.

**Animal transport:** Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. A business exclusively providing animal transport only possesses the animals.

**Auditor:** Personnel made available by the certification body for the auditing of businesses. The auditor's responsibilities are described in DIN EN ISO/IEC 17065.

**Batch:** An identifiable quantity of feed verifiably having common properties, such as origin, type, type of packaging, packer, shipper, or labelling.

**Bill of lading:** Delivery slips and CMR consignment notes as well as master's receipts and consignment bills (for transport by ship), in analogue or digital form, are defined as bills of lading. Invoices and product specifications are not deemed to be bills of lading.

Business: A general organisation which may consist of multiple sites/operating units.

**Calendar year:** Time period from 1 January until 31 December of a year. The VLOG Standard refers to the Gregorian calendar.

**Calves:** Cattle offspring from birth to 6 months old.

**Carrier:** A business that transports goods from one location to another. The goods do not have to be the property of the carrier/shipping company.

**Certifier:** Personnel made available by the certification body for certifying businesses. The certifier's responsibilities are described in ISO/IEC 17065.

**Component:** All ingredients, additives, auxiliary processing substances, or other substances within the meaning of Section 3a, EGGenTDurchfG used in the production of feed or food products.

**Compound feed:** Compound feed are mixtures of feed materials (input products for feed), with or without additives, which are intended as complete or supplementary feeds for animal nutrition.

Contamination: Generic term for carryover, interchange or mixing

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

**Correction:** A correction is a measure to eliminate a known fault.

**Corrective action:** Action/actions, leading to the elimination of the root causes of a fault, a shortcoming or any other undesired situation in order to avoid their reoccurrence or to reduce the frequency of reoccurrence.

**Defective product:** Food or feed that does not comply with "Ohne Gentechnik" or "VLOG geprüft" requirements.

**Document check:** External audit, which is only carried out for businesses:

- that do not exceed a certain size (cf. Chapter E 1) or
- that are certified under EU Organic Agriculture Regulation No. 2018/848 (<u>standards</u> <u>recognised as equivalent</u>) and are applying for a licence from VLOG to use the "Ohne GenTechnik" seal for food, for which additional requirements must be met

Certain business documents are checked (e.g. facility description, delivery slips, GMO-Free certificates, specifications) without an on-site facility inspection (cf. Chapter Z 3.6).

**Drop shipping:** Drop shipping refers to the trading method wherein the goods are transported directly from the supplier to the customer of the drop shipper. The drop shipper does not take physical possession of the goods, but has a contractual relationship with the customer and issues the invoice for the goods.

**Dual production:** Shared use of facilities and/or transportation means for the production, processing, transport, storage, handling and/or trade of "Ohne Gentechnik" food or "VLOG geprüft" feed and food that does not comply with "Ohne Gentechnik" or "VLOG geprüft" requirements.

**EGGenTDurchfG:** German act on the implementation of European Union regulations in the area of genetic engineering and on the labelling of food produced without genetic engineering processes (German EC Genetic Engineering Implementation Act).

**Evaluator:** Personnel made available by the certification body for the auditing of businesses. All information and results related to the on-site audit (evaluation) must be evaluated. The evaluator may not be involved in the on-site audit.

**External service provider:** A business (contractor) that provides services and processes to another business (client) for a fee. The duration and substance of these services must be established in writing (e.g., by contractual agreement).

Examples of external services at the various stages:

- Logistics: Transport/storage of feed/food
- Feed production: Job order production of feed (private labelling)
- Agriculture: Outsourcing of part of production to a facility/stall that does not belong to the business
- Food processing: Slicing of cheese (slicer), sterilisation of spices, bottling of food

Facility: Legally independent businesses with one or several sites.

**Feed business:** All businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in the production, manufacturing, processing, storage, handling, transportation or distribution of feed, including manufacturers who produce, process or store feed to be fed to animals in their own business (Regulation (EC) No. 178/2002).

**Feed manufacturing/processing:** All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc.

**Feed material:** Feed materials are feeds intended, as such or in processed form, to be fed to animals or used in the production of compound feed. Feed materials are of plant, animal or aquatic origin, or composed of other organic or inorganic matter.

**Feed not subject to compulsory labelling:** Feed which, according to Regulations (EC) No. 1829/2003 or No. 1830/2003, is not subject to compulsory labelling as "genetically modified".

**Feed subject to compulsory labelling:** Feed which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, has to be labelled as "genetically modified".

**Feed:** Substances or products, including additives, be it in processed, partially processed or unprocessed form, which are intended for oral feeding of animals.

**Food business:** Any and all businesses, no matter whether they are profit-oriented or not and whether they are publicly or privately held, that are involved in an activity connected to the production, processing, and distribution of food.

**Food preparation:** Preparation comprises sorting and labelling unprocessed products under Regulation (EC) No. 852/2004 as well as the activities referred to in Art. 2 (1) n) of Regulation (EC) No. 852/2004 and slaughter of animals.

**Food processing:** Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding or a combination of these various processes (Regulation (EC) No. 852/2004).

**Food:** Any and all substances or products that are intended for, or which can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

**GMO:** Genetically modified organisms. According to EU Directive 2001/18/EC these are organisms in which the genetic material has been modified by means of molecular biological methods in a way that naturally is not possible by interbreeding and/or recombination.

**Group member:** (Agricultural) business, site or branch contractually integrated into a VLOG group:

- A group member may only be a member of one VLOG group for a specific area of applicability (e.g. cattle cow's milk (raw))
- If a group member produces animals/animal products for different areas of applicability (e.g. cow's milk (raw) and fast stock), the business may be a group member of different VLOG groups for each area of applicability (cf. expansion certification Agriculture)
- If a business is a member of a VLOG group, independent certification according to the VLOG Standard is not permissible for the same area of applicability.

**Group organiser:** Business in a VLOG group that organises the certification of the group and holds responsibility for a risk management system that includes the agricultural group members or retail group members.

**Handling:** Handling comprises all services directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).

**Inter-facility use of machinery and equipment:** Joint use of transport vehicles, harvesting vehicles or other agricultural machines or equipment by multiple businesses/facilities.

**Internal audit:** General audit process for all of the business's own activities. Carried out by or on behalf of the business for internal purposes. Internal auditing is an independent, objective monitoring and consulting activity that is intended to provide added value and improve the operations of a business.

**Last living organism:** The last organism that is able to pass on its genetic information.

**Livestock trade:** Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transporting and resting, until the completion of unloading of the animals at the intended destination. As opposed to the animal carrier, a livestock trader owns the animals and may also take possession of the animals if applicable.

**Logistics business:** Any and all businesses which carry out logistical activities associated with food and feed, e.g., transport, storage, handling, distribution, loading and unloading.

#### Lot: See batch.

Main ingredient: Highest ingredient in terms of quantity

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

**Matrix organiser:** Business in a VLOG matrix that organises the certification of the matrix and holds responsibility for a risk management system that includes all matrix sites.

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

Mineral feed: Supplementary feed containing at least 40 % crude ash.

**Mobile Grinding and Mixing Facilities:** Facilities used commercially and for multiple operations, classified as a feed business (cf. Part C).

**Non-compliant feed, animals, raw materials, products:** do not meet the specifications of the VLOG Standard.

**Non-VLOG animals:** Animals not certified in accordance with the VLOG Standard.

**"Ohne Gentechnik":** Meeting the requirements of the EC Genetic Engineering Implementation Act (EGGenTDurchfG). For purposes of harmonisation with the requirements of the EGGenTDurchfG, the VLOG Standard uses the standard term "Ohne Gentechnik".

**"Ohne Gentechnik"-compliant feeding:** Feeding that meets the specifications of the EC Genetic Engineering Implementation Act (i.e. feeding solely with feed that is not subject to compulsory labelling).

**"Ohne Gentechnik" quality, products and raw materials:** Usable in the "Ohne Gentechnik" process (meets the requirements of EGGenTDurchfG and the VLOG Standard).

**Operating unit:** Parts of an agricultural business which are completely separate from each other, except for their organisation. This may apply for, e.g., different barns or storage sites for feed. For agricultural businesses in Germany, parts of such a business that are assigned a VVVO number are generally defined as an operating unit.

**Other substances within the meaning of Sec. 3a (5) EGGenTDurchfG:** Substances within the meaning of Sec 5 (2), Food Labelling Regulation (LMKV) in the version dated 18 December 2007.

**Outsourcing:** Takes place if the outsourcing laboratory is not accredited for the parameter and outsources GMO testing to another laboratory.

Plant-based production: The cultivation of primary products, including harvesting and foraging.

**Positive test result:** Any test result that confirms the presence of GMOs in feed, raw materials or products (regardless of the amount of GMO content). A positive test result does not automatically result in exclusion of the goods from "VLOG" production/marketing. The applicable limit values and conditions of EU Regulations 1829/2003 and 1830/2003 and EGGenTDurchfG must be followed for this classification (cf. Chapter A 8).

**Private Labelling (feed):** Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the client's (private labeller) specifications or the goods are purchased from the client and sold in Private Labeller's name.

**Processed product:** Food which has been produced from unprocessed products; these products may contain ingredients that are necessary for their production or for imparting special qualities.

**Processing:** A substantial modification of the initial product, e.g., through heating, smoking, curing, ripening, desiccating, marinating, extracting, extruding, or through a combination of these different procedures (Regulation (EC) No. 852/2004).

**Products (food):** All substances or products that are intended for, or which in reasonable discretion can be expected to be intended for, human consumption, be it in processed, partially processed or unprocessed form.

**Raw materials/products not subject to compulsory labelling:** Food which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, is not subject to compulsory labelling as "genetically modified".

**Raw materials/products subject to compulsory labelling:** Food which, according to Regulations (EC) No. 1829/2003 and No. 1830/2003, is subject to compulsory labelling as "genetically modified".

**Raw materials:** Any and all materials used to produce a food product.

**Retail:** Handling and/or processing of food and its storage at the point of sale or delivery to consumers, including shops, supermarket distribution centres and wholesale outlets.

**Risk (within the meaning of the Standard):** The probability of the occurrence of damage or nonconformity (legal or with regards to the standard) to "Ohne Gentechnik" food or "VLOG geprüft" feed

**Risk-prone feed:** Feed that has a higher risk of GMO contaminations due to the cultivation situation of the plant species, origin, processing and/or supply chain. In accordance with the VLOG Standard, their compliance must be ensured by monitoring through GMO testing or a VLOG certificate.

- In the Feed Stage, feed is graded into risk-prone feed on the basis of a risk assessment of the feed business (cf. Chapter C 3.3).
- For the Agriculture Stage, Chapter E 4.2 defines risk-prone feed.

**Shipping company:** See Carrier.

**Site:** A site is defined as all premises and buildings of a business at a given postal address. Examples of an address are "Bahnhofstrasse 3a" or "Wiesengrund 1-5".

#### Small agricultural operation:

- The main production focus is on milk, with a dairy herd of less than 40 lactating animals.
- The main production focus is on eggs, with less than 10,000 animals.
- The main production focus is on broiler chicken, with less than 16,000 fattening places.
- The main production focus is on fattening pigs, with space for less than 600 animals.
- Or a facility, independent of the main product and number of animals, with not more than 1 fulltime employee (at least 38 hrs/week) other than the facility manager and any members of the manager's family.

**Standards recognised as equivalent:** Quality standards under which certification has been recognised by VLOG as equivalent to certification under the VLOG "Ohne Gentechnik" Production and Certification Standard. An additional VLOG-certification of the relevant product (food, ingredient, additive, processing aid), animal or feed is not required if it is certified under the recognised standard and any necessary additional requirements have verifiably been met. A list of equivalently recognised standards can be found here: <u>Standard recognised as equivalent</u>.

**Stationary Grinding and Mixing Facilities:** Facilities existing in the operation and used exclusively within the operation.

**Storage:** The service of temporary storage of food and/or feed.

**Subcontracting:** Subcontracting means that the laboratory itself is accredited for this parameter, but due to special circumstances such as a lack of laboratory employees or resources, it assigns this parameter to another laboratory accredited for said parameter.

**Supplementary feed:** Compound feed having a high content of certain substances, but the composition of which makes it suitable for the daily ration only in combination with other feeds.

**Supplier:** The business from which the goods are bought. This can be, for example, the manufacturer or dealer.

**Swappable or non-swappable GM feed/raw materials:** GM feeds are swappable if their use, by their nature, would also be feasible in "Ohne Gentechnik" production; e.g. GM soy meal in pig fattening and "Ohne Gentechnik" milk production. Feed is non-swappable if clearly assigned to a production line and their use in "Ohne Gentechnik" production is highly unlikely; e.g. GM milk replacers for calf rearing and "Ohne Gentechnik" milk production.

**Trading:** Trading comprises all activities within the scope of which goods are sold – i.e. not produced at one's own facilities – and resold. In contrast to drop shipping, the trader takes physical possession of the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).

**Transport:** Transport means conveying goods from one place to another.

**Unannounced audit:** An audit of a retail branch conducted by the certification body without prior notice.

**VLOG Agriculture group:** A VLOG Agriculture Group is a combination of at least two agricultural businesses/sites (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture. Group certification is available for a business with at least two sites as well as for the joint certification of multiple businesses with their sites.

**VLOG animals/VLOG animal categories:** Animals or animal groups suitable for "Ohne Gentechnik" labelling of the food produced from them, and which are from agricultural businesses which

- Are either themselves certified according to the VLOG Standard for animals or meat, or
- Are covered by a group organisation according to the VLOG Standard for animals or meat.

**VLOG certificate:** Confirmation of successful compliance with the VLOG Standard issued by a certification body recognised by VLOG.

"VLOG geprüft" quality: Quality of a feed that is certified in accordance with the VLOG Standard.

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

**"VLOG" raw materials, products:** Raw materials and products that are certified in accordance with the VLOG Standard and can be used in the "Ohne Gentechnik" process.

**VLOG retail group:** A VLOG Retail Group is a combination of branch operations (the so-called group members) for the purpose of VLOG group certification in retail.

**VLOG Standard:** "Ohne Gentechnik" Production and Certification Standard as amended from time to time.

Young cattle: Cattle offspring aged 7 to 12 months.

## Annexes

### **Part 1 Suppliers' Declarations**

- (1) GMO-Free Certificate
- (2) Certificate for "Ohne Gentechnik" Compliant Feeding of Animals
- (3) Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)

### **Part 2 Analytics**

- (4) Sampling Log
- (5) repealed
- (6) repealed

### (7) Reduction of the Scope of Testing after Changing Feed in Group Organisations

### **Part 3 Certification**

- (8) repealed
- (9) repealed
- (10) repealed
- (11) VLOG Certificate Template
- (12) Areas of Application of VLOG Certification

### Part 4 Audit Documents

- (13) Facility Description Logistics
- (14) Checklist Logistics
- (15) Facility Description Feed Manufacturing
- (16) Checklist Feed Manufacturing
- (17) Facility Description Mobile Grinding and Mixing Facilities
- (18) Matrix Description and List of Sites
- (19) Checklist Matrix Organisation
- (20a) Facility Description Agriculture
- (20b) Facility Description Agriculture Beekeepers
- (20c) Facility Description Animal Transport/Livestock Trade
- (21) repealed
- (22a) Checklist Agriculture including Beekeepers
- (22b) Checklist Animal Transport and Livestock Trade
- (23) Group Description Agriculture including Members List
  - (23a) Members List
  - (23b) Members Lists laying hens
  - (23c) Transmission of Stable Spaces
  - (23d) Evaluation/Overview Test Results
  - (23e) Data Release Statement
- (24) Checklist Group Organisation
- (25) Facility Description Food Processing/-Preparation
- (26) Checklist Food Processing/-Preparation
- (27) Group Description Retail Bulk Goods
- (28) Checklist Retail Bulk Goods (Headquarters)
- (29) Checklist Retail Bulk goods (Branch)

#### **Part 5 Protocols and Confirmations**

- (30) Grinding and Mixing Protocol
- (31) VLOG Incident Sheet Feed Manufacturing and Logistics
- (32) VLOG Incident Sheet Matrix Organiser
- (33) VLOG Incident Sheet Agriculture and Animal Trade
- (34) VLOG Incident Sheet Agricultural Group Organisation
- (35) VLOG Incident Sheet Food Processing/Preparation, Logistics and Retail

## **Data protection & Privacy**

VLOG undertakes to handle the personal data of its contracting partners carefully and in accordance with the data protection provisions of the German Data Protection Act (DSG) and the General Data Protection Regulation (GDPR). The persons responsible for data processing at VLOG comply with all required technical and organisational measures to ensure data security. Personal data of which VLOG becomes aware in the course of the contractual relationships is processed exclusively in order to discharge this contractual relationship. The following data categories are processed:

- Master data (e.g. name, address, contact information, legal representatives, company domicile)
- Operational data
- Contract data
- Correspondence

VLOG only processes and stores personal data for as long as necessary in order to fulfil the contractual obligations. After the obligations have lapsed, the data is blocked or deleted.

Statutory retention obligations may apply additionally, such as retention obligations under commercial or tax law (e.g. Commercial Code, Tax Code). Insofar as such retention obligations apply, the data is blocked or deleted at the end of these obligatory retention periods.



# "Ohne Gentechnik" Production and Certification Standard Part Z - Certification

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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# Part Z - Certification

# Z1 Introduction

The VLOG "Ohne Gentechnik" Production and Certification Standard consists of several parts. This Part Z of the VLOG Standard, Certification, describes the various possibilities of VLOG-certification and the associated processes and includes the resulting requirements for (future) VLOG-certified businesses and VLOG-recognised certification bodies.

The requirements for VLOG-recognised certification bodies and their personnel and the (re-) recognition process are described in the <u>VLOG Guideline for Certification Bodies</u>, <u>Auditors</u>, <u>Evaluators and Certification Bodies</u>.

# Z 2 Types of Certification

As regards the VLOG-certification of businesses, the VLOG Standard distinguishes among the following types of certification:

- Individual certification of businesses
- Matrix certification for Logistics and Feed Manufacturing (for associated businesses/sites of the Logistics and/or Feed Manufacturing stages)
- Group certification in agriculture (for associated agricultural businesses/sites)
- Group certification in retail (for associated branch operations)
- Expansion certification in agriculture (to expand an existing VLOG certification of an agricultural business by adding one or more new areas of application or incorporating one or more new areas of application into a VLOG group certification of an agricultural business (e.g., cattle cow's milk (raw))

The sequences of the different certification processes and the related requirements and rules for businesses and certification bodies are described in the following chapters.

## Z 2.1 Individual certification

Under this type of certification, an individual business is certified according to the VLOG Standard. An individual certification is permissible for businesses at the Logistics, Feed Manufacturing, Agriculture and Food Processing/Preparation stages.

It is performed in the following steps:

- Applying to a VLOG-recognised certification body for certification in the desired area(s) of application
- Concluding an Audit Agreement with this certification body and concluding a Standard Usage Agreement with VLOG
- Planning of audits
- Conducting an audit, including audit documentation and possible risk grading of the business, depending on the stage
- Audit evaluation/review by the certification body
- Certification of the business

## Z 2.2 Matrix certification for the Logistics and Feed Manufacturing Stages

Combinations of businesses/sites at the Logistics and Feed Manufacturing stages are certified according to the VLOG Standard under this type of certification. The matrix is organised by a matrix organiser, while the participating businesses are referred to as matrix members, and their sites, as matrix sites. The VLOG-certificate is issued to the matrix organiser.

The matrix certification for Logistics and Feed Manufacturing (hereinafter: the "matrix certification") is performed in the following steps for initial and follow-up certifications.

**i** *Explanation: The described procedure is also to be applied to new matrix sites.* 

- The matrix organiser applies to a VLOG-recognised certification body for certification in the desired area(s) of application.
- The matrix organiser concludes an Audit Agreement with this certification body and concludes a Standard Usage Agreement with VLOG.

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

- Submission of the matrix description (cf. Chapter D 2.2.1) and determination of the certification procedure (33% or 100% process) by the matrix organiser
- In case of the 33 %-process: initial data collection by the matrix organiser
- Planning of audits
- Conduct of an audit of the matrix organiser and the matrix sites, according to the 33% or 100% process
- Audit evaluation/review by the certification body
  - including confirmation/correction of the audit result
  - including clearance of the approved sites for the list of sites
- Certification of the VLOG matrix for logistics and feed manufacturing

# Z 2.2.1 Initial Certification Based on Initial Data Collection by the Matrix Organiser (33%-process)

The initial certification according to the 33% process is performed in the following steps:

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

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

- The matrix organiser performs the initial collection of data from all sites, i.e. on-site selfmonitoring on the basis of the VLOG checklists of the respective Logistics and Feed Manufacturing stage, by demonstrably competent personnel. The matrix organiser thereby verifies the information in the site-related facility descriptions. These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.
- The matrix organiser subsequently forwards all facility descriptions and checklists of the initial data collection for each member/site to the certification body.

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- The certification body reviews and evaluates the matrix description of the matrix organiser and the site-related facility descriptions of all matrix sites. Information/documents that are missing or must be corrected are to be requested from the matrix organiser.
- Once all information/documents are available, the certification body will review the matrix organiser's results of the initial data collection through own initial audits at:
  - 100% of feed manufacturers (except for mobile grinding and/or mixing facilities)
  - at least 33% of mobile grinding and/or mixing facilities
  - at least 33% of logistic sites
- The certification body compares the results of initial data collection by the matrix organiser with its own audit results, initiates any actions and decides on the certification and the clearance of the sites for inclusion on the list of sites based on its own audit.

The certification body is responsible for ensuring a balanced distribution of the audits of the sites, considering the risk grading of the matrix organiser and e.g. size of the business/site and its organisation, geographic location, supplier, etc. The certification body has the right not to accept the data collected by the matrix organiser and to conduct an audit at more than 33% of the sites. The decision must be justified in a verifiable manner.

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

Explanation: If the 33%-process is selected, each site must be audited by the matrix organiser prior to being accepted (Initial Data Collection).

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

Example: If eight logistics sites join the matrix in March, the matrix organiser conducts an initial survey of all, and the certification body conducts an initial audit of at least three. If an additional site joins the matrix in June of the same year (9th site), 33% of the sites in this calendar year are already covered by the three sites audited in March (33% out of 9 = 3). The new site can be included in the matrix after initial data collection without an initial audit by the certification body. If three additional sites are to be added to the matrix in October, one of them would have to be audited by a certification body again (33% out of 12 = 4) after the initial data collection.

### Z 2.2.2 Initial Certification on the Basis of 100% Audits by the Certification Body (100%-process)

The initial certification according to the 100% process is performed in the following steps:

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

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

- The matrix organiser forwards the facility descriptions for each member/site to the certification body.
- The certification body must perform an initial audit of all matrix members. (There is no initial data collection by the matrix organiser.)
- The decision on certification and the clearance of the sites for inclusion on the list of sites are based on the VLOG audit.

## Z 2.3 Agricultural Group Certification

Combinations of agricultural businesses/sites are certified according to the VLOG Standard under this type of certification. The VLOG group is organised by a group organiser, the participating businesses/sites are called group members. The VLOG-certificate is issued to the group organiser.

Group certification in agriculture for the initial and follow-up certification is to be performed in the following steps:

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

- Applying to a VLOG-recognised certification body for certification in the desired area(s) of application
- Concluding an Audit Agreement with this certification body and concluding a Standard Usage Agreement with VLOG
- Submitting the group description (cf. F 2.2.1), including risk grading of the group members and determination of the certification process (25% or 100% process) by the group organiser
- In case of the 25 %-process: initial data collection by the group organiser
- Planning of audits
- Conducting the audit of the group organiser and the group members in accordance with the 25% or the 100% process
- Audit evaluation/review by the certification body
  - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
  - including clearance of the approved group members for the list of members
- Certification of the VLOG agricultural group

# Z 2.3.1 Initial Certification Based on Initial Data Collection by the Group Organiser (25%-process)

Initial certification according to the 25% process is performed in the following steps:

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

# i Explanation: This audit is generally done before the audits of the group members.

- The group organiser employs verifiably competent personnel to perform initial data collection from 100% of the group members, i.e., on-site self-monitoring utilising the VLOG checklists for the Agriculture stage (Annex (22a)) or for the livestock trade (Annex (22b)), if appropriate. The group organiser thereby verifies the information in the facility descriptions of the individual group members. These initial data collections are to be performed in coordination with the certification body, and are to be formally approved by the certification body.
- On the basis of these initial data collections, the group organiser is to perform a risk grading of all group members according to the requirements in Chapter Z 3.3. The group organiser subsequently forwards all facility descriptions also indicating the corresponding risk categories and the checklist for each group member to the certification body.

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- The certification body reviews and evaluates the group description of the group organiser and the facility descriptions of all group members. Information/documents that are missing or require correction are requested from the group organiser.
- Once all information/documents are complete, the certification body is to verify the results of the initial data collection by the group organiser for at least 25% of the group members by performing its own initial audits.
- During the 25% audit, the certification body is responsible for ensuring a balanced distribution of the audits of the group members, taking into account the risk grading of the group organiser and e.g. size of the facility and organisation, geographic location, feed etc.
- The certification body compares the results of initial data collection by the group organiser with its own audit results, initiates any actions and decides on the certification and the clearance of the sites for inclusion on the list of sites based on its own audit. The certification body has the right not to accept the data collected by the group organiser and to conduct an audit of more than 25% of all group members. The decision must be justified in a verifiable manner.
- The certification body is to verify the grading of the group members into risk categories and will base the audit intervals of each group member on this grading.

Explanation: If 25%-process is selected, each facility must be audited by the group organiser prior to addition (Initial Data Collection).

Without an audit by the certification body, a new member can only be accepted if the 25% requirement is still met after the member's acceptance within the respective calendar year. If this is not the case, a corresponding number of facilities/candidates must be audited by the certification body in order to meet this value.

Example: if ten farms join the group in March, the group organiser arranges an initial data collection for each facility and the certification body performs an initial audit on at least three. If two additional farms (11th and 12th farms) then join in June of the same year, the 25% for this calendar year is already covered by the three farms audited in March (25% of 12 = 3). The two new farms can be included in the group without a certification body audit. If four additional farms were to join the group in October, one of these farms would have to be audited by the certification body (25% of 16 = 4).

### Z 2.3.2 Initial Certification on the Basis of 100% Audits by the Certification Body (100%)

The initial certification according to the 100% process is performed in the following steps:

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

**i** Explanation: This audit is generally done before the audits of the group members.

- The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body must perform an initial audit of all group members.
- A review of the grading of risk categories, clearance of the members for the list of members and the decision on certification is made on the basis of this VLOG audit.

### Z 2.3.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body to audit the group members, the following requirements must be met:

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- The groups must be organised such that each certification body can independently audit a respective group or its scope of applicability.
- The group description must be submitted to each certification body.
- Each certification body must also audit the group organiser's compliance with the requirements in the determined scope of certification. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an onsite audit of the group organiser.
- Only one certification body, in coordination with the other involved certification bodies, will issue a certificate for the entire group.
- A written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is in place.
- The group organiser ensures that all activities necessary for certification are performed.

### Z 2.4 Retail Group Certification

Combinations of branches/sites at the Retail stage are certified according to the VLOG Standard under this type of certification. The group is organised by a group organiser, the participating branches/sites are called group members. The VLOG-certificate is issued to the group organiser.

Retail group certification is to be performed in the following steps:

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

- Applying to a VLOG-recognised certification body for certification in the desired area(s) of application
- Concluding an Audit Agreement with this certification body and concluding a Standard Usage Agreement with VLOG
- Submitting the group description, including risk grading of the branches (cf. Chapter H 2.2.1) and determination of the certification process (10% or 100% process) by the group organiser
- Planning of audits
- Conducting the audit of the group organiser and the group members (according to the 10% or the 100% process)
- Audit evaluation/review by the certification body
  - including confirmation/correction of the audit result
  - including clearance of the approved group members for the list of members
- Certification of the VLOG retail group

### Z 2.4.1 Initial and Follow-up Certification Retail VLOG Groups

The initial certification and the follow-up certification of VLOG Retail groups are based on the following process:

• The certification body conducts one initial audit or routine audit of the group organiser per calendar year.

**i** Explanation: This audit is generally done before the audits of the group members.

- The certification body shall conduct one initial or routine audit of the following sized samples of group members:
  - 10% of the group members per calendar year if "Ohne Gentechnik"/"VLOG" food is centrally purchased and traceability up until sale to the customer must be ensured (cf. Chapter H2.12). These audits are announced.
  - 10% of the group members per calendar year if "Ohne Gentechnik"/"VLOG" food is centrally purchased and traceability up until the service counter must be ensured (cf. Chapter H 2.12). These audits are unannounced.
  - 100% of the group members if the "Ohne Gentechnik"/"VLOG" food may be purchased locally. These audits are announced.

Based on the information provided by the group organiser in the group description (cf. Chapter H 2.2.1) the certification body conducts audits of branches, which may either be announced to the central purchasing department or unannounced. If the audits are announced and the certification body concludes, based on its on-site audit, that traceability can only be ensured up until the service counter, 10% of the audits of branches in subsequent years will be unannounced.

f

Explanation: If all the audit criteria, incl. original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.

### Z 2.4.2 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body to audit the group members, the following requirements must be met:

- The groups must be organised such that each certification body can independently audit a respective group or its scope of applicability.
- The group description must be submitted to each certification body.
- The certification body must also audit the group organiser's compliance with the requirements in the determined scope of applicability. Depending on the area of responsibility, the audits may be conducted on-site at the group organiser or at the group member. This verification can also be accomplished by sharing information amongst the certification bodies or with the group organiser. It is not necessary for each certification body to independently perform an on-site audit of the group organiser.
- Only one certification body, in coordination with the other involved certification bodies, will issue a certificate for the entire group.
- A written agreement that governs the exchange of information and respective scope of responsibility between the certification bodies is required.
- The group organiser ensures that all activities necessary for certification are performed.

### Z 2.5 Expansion Certification in Agriculture

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

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

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

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

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

# Z 3 Certification Procedure

### Z 3.1 Audit Types

The various types of audits for VLOG certification are defined as follows (in alphabetical order):

#### Document audit:

External audits that are to be performed only in the following cases:

- As part of an expansion certification in agriculture to integrate new areas of application (cf. Chapter Z 2.5), the agricultural business being obligated to comply with specific criteria
- After KO grading if the grade resulted solely from a lack of documentation. The certification body shall decide on the scope of the document audit depending on the situation and the KO grading.

In a document audit, business documents (e.g. process and work instructions, delivery slips) are audited without an on-site facility inspection (cf. Chapter Z 3.6)

#### Initial audit:

During the initial audit, a business will be audited one first time in accordance with the VLOG Standard. It is a full on-site audit of all sites/business units involved in VLOG production of the business. The auditor must assess all applicable requirements of the Standard and/or the established stages. The initial audit forms the basis for the initial certification of the business, provided all prerequisite and requirements are met.

The time of the initial audit is to be determined jointly by the business and certification body, taking the following into account:

- Stages of Logistics, Feed manufacturing, Group organisation Agriculture, Matrix organisation, Food processing/preparation, Retail Sale of bulk animal food products:
  - The audit is to take place during production but not necessarily during VLOG production. In the case of seasonal production, the initial audit is to be carried out during the production season.
- Agriculture Stage:
  - The audit is to be carried out after conversion to feeding with feed not subject to compulsory labelling.

#### **Expansion audit:**

If, during the validity period of the certificate, the business wants to include new product groups, processes, production lines, etc. into the scope of applicability, this is to be assessed within the framework of an expansion audit.

Whether a full audit must be performed or only specific requirements checked will be decided by the relevant certification body. The latter will also decide, in consultation with the business, whether the audit of the requirements must be performed on-site or whether an audit of all the relevant documents/records will suffice.

If the requirements were met, the VLOG certificate or the scope of application will be amended to include the new product groups, processes, etc. If no complete on-site audit was performed, the amended certificate will expire at the same time as the certificate for the previous routine audit.

#### **Combination audit:**

Compliance with the VLOG Standard may be assessed during an audit in combination with other standards in order to take advantage of synergies. All prescribed VLOG facility descriptions, checklists and other required documents must be fully completed.

#### Follow-up audit:

Follow-up audits serve to assess the implementation and effectiveness of corrective actions at the audited business. The auditor will only evaluate specific requirements of the VLOG Standard onsite. If the follow-up audit has been announced beforehand, the certification body must document the reason for the announcement of the audit. The certification body is to select the timing of the follow-up audit such that the efficacy of the specified measures can be reviewed.

#### **<u>Routine audit</u>** (to renew or review certification):

The routine audit is a full on-site audit of all sites/business units involved in the VLOG production of the business. All requirements of the present Standard will be assessed by the auditor.

If the business still meets the requirements of the VLOG Standard, the business will be recertified. Each business is responsible for updating the own certification and for having the routine audit

performed in a timely manner. The audit takes place during VLOG-compliant activity and/or VLOG production. The routine audit is usually announced beforehand.

#### Audit on suspicion:

Audits on suspicion serve to investigate suspected non-compliance; the auditor will only assess selected criteria of the VLOG Standard on-site. Audits on suspicion are generally not announced beforehand. If the audit on suspicion is announced beforehand, the certification body must document the reason for the announcement of the audit.

### Z 3.2 Application for Certification, Conclusion of an Auditing Contract

The business/matrix organiser/group organiser applies for certification with a VLOG-recognised certification body and thereby specifies the desired scope of applicability (cf. Annex (12) incl. stage and sub-stage) which is to be certified. A written agreement on the conduct of independent audits and individual/matrix or group certification according to the VLOG Standard shall be concluded between the business/the matrix organiser/the group organiser and the VLOG-recognised certification body.

### Z 3.3 Risk Grading of Businesses

The VLOG Standard follows a risk-based approach for the evaluation of processes and monitoring of the business. This includes risk grading of the business. The risk grading serves to identify and estimate potential sources of introduction and risk of contamination of GMOs in the business.

Depending on the business stage, the risk grading and/or risk category will have an impact on audit intervals and/or the number of analyses.

Grading will be done by the business<sup>1</sup> before the initial and routine audit; it is assessed and, if necessary, redefined by the auditor and evaluator in every audit. The definition is to be documented or modified as needed in the checklist by the auditor and evaluator, as necessary.

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

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

### Z 3.3.1 Logistics and Feed Manufacturing Stage

In the Feed Manufacturing and Logistics Stages, grading into risk categories will be based on the production system of VLOG production (e.g. GMO at the site or solely production exempt from mandatory labelling).

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

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

### Z 3.3.2 Agriculture Stage

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

#### <u>General</u>

Risk grading is performed according with the criteria listed in the following Table Z 2.

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

<u>**Grading a business with various areas of application** (e.g., cattle – cow's milk (raw) and cattle – livestock for fattening, cattle – cow's milk (raw) and pigs – fattening pigs):</u>

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 Z 2 are observed for each area of application

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

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<ul> <li>Only possible if all of the following criteria are met:</li> <li>No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site.</li> <li>Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.</li> </ul>	Feed subject to compulsory labelling, which can be swapped, is present at the site. Grading in Risk Category 1 is only possible if installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling, which can be swapped, are completely segregated from the VLOG operating unit.	Following initial conversion to VLOG production (possibly time-lagged), feed subject to compulsory labelling, which can be swapped and is handled with the same installations/feeding equipment/machines used for VLOG feed manufacturing, is present at the site <sup>2</sup> .
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn	After the beginning of "Ohne Gentechnik" feeding, no switch to feeding with feed subject to compulsory labelling takes place in the VLOG operating unit/in the VLOG barn.		After initial conversion to "Ohne Gentechnik" feeding, feeding oscillates between "Ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling (e.g. in production systems involving animals whose lifespan is longer than the "Ohne Gentechnik" minimum feeding conversion period).
Certification status of risk- prone feed used in VLOG production (cf. Chapter E 4.2)	Risk-prone feed and the feed supplier (excluding see Chapter B 1 and C 1) must be certified pursuant to the VLOG Standard or a standard recognised as equivalent. This also applies to oils used		Risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.

<sup>&</sup>lt;sup>2</sup> This also includes the internal or external dual use of mixer vehicles for VLOG production.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
	for dust binding in grinding and mixing facilities.		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 and C 1).
Use of grinding and/or mixing facilities	Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self-mixers exclusively process feed not subject to compulsory labelling.	<ul> <li>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.</li> <li>Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:</li> <li>The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio<sup>3</sup>).</li> <li>Measures to prevent contaminations with GMO are described in the QM manual of the facility operator.</li> </ul>	Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self-mixers process both feed subject to compulsory labelling and such that is not. Grading into Risk Category 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT).

<sup>&</sup>lt;sup>3</sup> Exception: If the VLOG farmer's organic-certified grinding and/or mixing facility of is used exclusively for organic-certified feed, the facility can be graded in Risk Category 0

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
Animal transport/livestock trade	The animals are not fed in the business/during transport.	The animals are fed in the business/durin periods. In this case, the other risk-gradin	

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

### Z 3.3.3 Food Processing/Preparation Stage

Risk grading will be carried out according to the following criteria:

### **Risk Category 0**

- The business only handles raw materials and products for which "Ohne Gentechnik" labelling would be permissible
- As a matter of principle, businesses that process or store GMOs on their premises cannot be graded as Risk Category 0.

#### **Risk Category 1**

• In the business and process steps there is a clear physical segregation in the processing of products for which "Ohne Gentechnik" labelling would be permissible and such products that do not meet the requirements for "Ohne Gentechnik" labelling

#### **Risk Category 2**

- There are process steps in the business without physical but with temporal segregation in the processing of products for which "Ohne Gentechnik" labelling would be permissible and such products that do not meet the requirements for "Ohne Gentechnik" labelling
- There is at least one test result from the audit period under consideration that exceeds the threshold value of 0.1% GMO per ingredient. This resulted from the business' failure to undertake actions to avoid contamination.

### Z 3.3.4 Retail Stage

Risk grading is based on the organisation of purchasing (centralised or decentralised).

There is no grading into risk categories at this stage.

# Z 3.4 Audit Frequency

The audit intervals shown in Table Z 3 are based on the type of certification and the risk grading of the business.

The audit interval commences as of the date the certificate is first issued.

If a follow-up audit for a business with an audit interval of > 1 calendar year is conducted earlier than necessary (e.g., one calendar year earlier), the subsequent routine audits are also to be scheduled correspondingly earlier.

### The following shall apply to the Matrix Organisation Logistics and Feed Manufacturing and Group Organisation Agriculture and Retail stages:

- At the start of the new auditing season, the matrix/group organiser must coordinate the audits for matrix/group members planned for the year with the certification body.
- The certification body is responsible for and monitors the compliance with audit dates. This is to be done with the support of the matrix/group organiser.

Stage	Audit frequency of routine audits	Specific requirement/note
Individual certification		
Logistics	Once per calendar year	If a drop shipper has a QS certification, the VLOG auditing interval can be adjusted to match the audit interval under QS controls (max. 2 years). - Drop shippers that convert feed to "VLOG geprüft" quality are exempted from this provision.
		The validity period of the VLOG certificate may not extend beyond the end of the second following year (relative to the date of the VLOG audit).
Feed manufacturing	Once per calendar year	If a mobile grinding and/or mixing facility has a QS certification, the VLOG auditing interval can be adjusted to match the audit interval under QS controls (max. 2 years). The validity period of the VLOG certificate may extend no longer than the end of the second following year (relative to the date of the VLOG audit).

Stage		Audit frequency of routine audits	Specific requirement/note
	Risk Category 0	Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
	Risk Category 1	Within 2 calendar years	i.e. at the latest in the second following calendar year of the last audit
Agriculture	Risk Category 2	Once per calendar year	<ul> <li>Supplement – Animal transport/livestock trade sub-stage</li> <li>If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit under the following conditions:         <ul> <li>Direct transport from the supplier to the buyer (e.g., the abbattoir), without intermediate stabling and/or feeding</li> <li>Unloading or trans-shipment between the starting point and the transport destination (e.g., at a collecting point) solely with respect to animals with individual identification and no feeding of VLOG animals.</li> </ul> </li> </ul>
Food Process	ing and Preparation	Once per calendar year	
Matrix Org	anisation in Logistics a	nd Feed Manufacturing	
Matrix organ	iser	Once per calendar year	
Matrix site Logistics and Mixing Facilit	Mobile Grinding and ties Stages	Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
	cturing stage (except for ing and/or mixing	Once per calendar year	

Stage	Audit frequency of routine audits	Specific requirement/note
Agricultural Group Organisation		
Group organiser	Once per calendar year	
Group member risk category 0	Within 3 calendar years	i.e. at the latest in the third following calendar year of the last audit
Group member risk category 1	Within 2 calendar years	i.e. at the latest in the second following calendar year of the last audit
Group member risk category 2	Once per calendar year	
Combination of individual certification a application per business:	and group certification in agricultu	re or combination of multiple group certifications with various areas of
	gory of the business (cf. Chapter Z 3.3	lication and is individually certified for another area of application, the audit ). Under certain conditions, different areas of application can be graded into 3.4).
Group Organisation Retail		
Group organiser	Once per calendar year	If all the audit criteria, incl. original accounting documents, can be audited at the branches, a separate audit of headquarters can be dispensed with.
10% of the group members if centrally purchased, traceability up until sale to the customer must be ensured	Once per calendar year	The audits are announced. If the audits are announced and the certification body concludes, based on its on-site audit, that traceability can only be ensured up until the service counter, 10% of the audits of branches in subsequent years will be unannounced.
10% of the group members	Once per calendar year	The audit is unannounced.

Stage	Audit frequency of routine audits	Specific requirement/note
if centrally purchased, traceability up until the service counter must be ensured		
100% of the group members if products are purchased locally	Once per calendar year	
External Service Providers		
External service providers that are audited as part of the VLOG audit of the client	With every routine audit of the client	

Table Z 3: Audit Intervals

# Z 3.5 Planning of audits

If announced audits are conducted, the following shall be coordinated between the auditor/certification body and the business:

- the audit date/time and expected duration thereof
- the audit area (including all relevant sites and external service providers included in the VLOG certification)

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

# Z 3.6 Performance of the Audit

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

### Introductory meeting:

- Introduction of the auditor and the persons involved in the audit
- Explanation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule
- Checking whether there is a Standard Usage Agreement, including VLOG ID (10-xxxx) and, if relevant, a sub-VLOG ID (10-xxxx-A/B, etc.) for the sites included in the certification<sup>4</sup>

**Document check and facility inspection** (sequence to be defined by the auditor):

### **Document check:**

- Review of the facility description and verification of risk grading, if necessary
- Check of the relevant business documents (e.g. organisational chart/organisational structure, quality management system, bills of lading)
- Verification of compliance with the requirements of the VLOG Standard (e.g. labelling of raw materials/feed, risk management)
- Mass flow control (input and output plausibility check in the facility)

### Facility inspection:

- On-site inspection of the production areas, equipment and related production processes at all the sites included under the certification and of the activities of external service providers requiring certification
- Verification of compliance with the system requirements (e.g. segregation of goods flows, risk analysis)
- Interview of staff
- As provided for and/or in the case of suspected non-compliance, sampling and GMO testing, as necessary

<sup>&</sup>lt;sup>4</sup> For group or matrix organisations, the Standard Usage Agreement is concluded between VLOG and the group or matrix organiser. Therefore, whether group or matrix members have the agreement in question need not be checked.

### **Grinding and mixing facilities:**

- Mobile grinding and mixing facilities: At least two of the facilities that are registered for VLOG certification will be inspected by the auditor (in particular through visual check and comparison of documents). The selection is performed in a risk-based manner. If the business only uses one facility for VLOG production, then this facility is to be inspected.
- Stationary grinding and/or mixing facilities: The inspection includes all facilities associated with the agricultural business.

### Final discussion:

- Summary of identified deviations and preliminary result
- Determination of any corrective actions to be taken by the business. These have no effect on the audit result.

# Z 3.7 Audit Documentation

The auditor documents the evaluation of the requirements and, if applicable, any identified deviations in the stage-relevant VLOG checklists in their most recent version. The certification body may create and use checklists in a customised format on the basis of the current VLOG checklists, provided the content of the checklist, the wording of the audit items and the underlying results calculation are used without change.

At the close of the audit, the auditor and the business shall confirm by electronic means or in writing that the VLOG checklist(s) have been filled-out completely. The certification body shall determine the form of electronic confirmation.

# Z 3.8 Evaluation of Compliance of the Requirements

The auditor examines and evaluates the compliance with each VLOG Standard requirement.

The auditor must demonstrably justify and document any identified deviations and breaches (B, C and KO grading) as well as the assessment N.A. in the checklist.

Grading	Description	Points	Note
A	Full compliance with a requirement	10 points	
В	Minor to moderate deviations from the requirement	5 points	
с	Non-compliance or major deviation from the requirement	-10 points	
ко	Requirements with a critical impact on "Ohne Gentechnik/"VLOG geprüft" labelling in case of non- compliance	Audit not passed	Depending on the specification in the checklists KO criteria may be graded as A, B, C or KO. They are listed in the respective chapters of the stages and

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

Grading	Description	Points	Note
			marked accordingly in the checklists.
N.A.	Not applicable	-	If a particular requirement is not applicable to the business, this requirement may be graded as N.A. (= not applicable).

#### Table Z 4: Evaluation of Compliance of the Requirements

If the same violation is repeated, the auditor or the certification body shall decide whether the same or a more severe grading is required.

# Z 3.9 Determination and Handling of Corrective Actions

The business shall establish written corrective actions and implementation periods for all deviations and violations found (B and C grades and KO grading), either during the audit or within four weeks after the audit. They shall be approved by the competent certification body.

A certificate may only be issued after the business has defined corrective actions and their deadlines for all deviations and breaches and these have been released by the auditor or the certification body.

B and C deviations may be examined by subsequent submission of representative documentation or, if this is not possible, by an on-site follow-up audit. This is to be decided by the certification body in a risk-based procedure.

The business or the group or matrix organiser shall be responsible for the implementation of the corrective actions in the business or by the group members or at the sites. The certification body is responsible for monitoring the effectiveness of the corrective actions.

# Z 3.10 Audit Result

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

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
<ul><li>more than 75% of the maximum points</li><li>No KO grading</li></ul>	passed	<ul> <li>Issuance of the VLOG certificate or inclusion in the VLOG group or VLOG matrix</li> </ul>	• When initial certification is in progress or after the withdrawal of a certificate, feed/raw materials/products and animals may not be labelled as "VLOG geprüft" or "VLOG" until after the certificate is (re)issued or after inclusion in the matrix/group.
<ul> <li>Only for document audit (expansion certification in agriculture)</li> <li>No KO grading</li> <li>"A" grade for the facility description requirement</li> </ul>	passed	<ul> <li>Issuance of the VLOG certificate or inclusion in the VLOG group</li> </ul>	• When initial certification is in progress or after the withdrawal of a certificate, feed/raw materials/products and animals may not be labelled as "VLOG geprüft" or "VLOG" until after the certificate is (re)issued or after inclusion in the matrix/group.
<ul> <li>less than 75% of the maximum points</li> <li>No KO grading</li> </ul>	not passed	<ul> <li>Within process of initial certification: No issuance of a VLOG certificate or inclusion in a VLOG group or VLOG matrix</li> <li>Within process of follow-up certification: no issuance of a new VLOG certificate (currently valid certificate is not suspended or revoked) or inclusion in a VLOG group or VLOG matrix remains in place for the time being until the end of the calendar year</li> <li>A new routine audit must be performed</li> <li>The certification body must notify VLOG within 2 working days about the failure to pass the audit</li> </ul>	When initial certification is in progress: feed/raw materials/products and animals may not be labelled as "VLOG geprüft" or "VLOG" until after the certificate is issued.

Total score, established grade	Audit Result	Consequences for certification, actions	Effects on Labelling and Marketing
		(does not apply to group or matrix members who did not pass the audits)	
One or more KO gradings	not passed	<ul> <li>No issuance of a VLOG certificate or inclusion in the VLOG group or VLOG matrix</li> <li>Certification body must suspend the current VLOG certificate within 2 working days or the group or matrix member must be removed from the list of members or sites</li> <li>The business must implement the required corrective actions before the VLOG certificate is reissued or before it will be added back to the list of members or sites</li> <li>A new routine audit must be performed. If the sole reason for KO evaluation was the lack of documentation, a document audit can be performed instead. The decision whether a new routine audit or a document audit must be performed to reation body.</li> <li>Certification body must notify VLOG about the KO grading within 2 working days (does not apply to audit of group or matrix members who did not pass)</li> </ul>	<ul> <li>With respect to an initial certification or after the withdrawal of a certificate, feed/raw materials/products and animals may not be labelled as "VLOG geprüft" or "VLOG" until after the certificate is (re)issued.</li> <li>If, due to the audit results, the certification of the VLOG matrix/VLOG group is suspended or revoked, the labelling with "VLOG"/"VLOG geprüft" or the "Ohne GenTechnik" seal is not permitted for any members of the VLOG matrix/VLOG group.</li> <li>The matrix/group may continue to market "VLOG" food and feed labelled "VLOG geprüft" even if individual sites/group members were excluded from the matrix/group. In this case, the marketing of food labelled "VLOG"/feed labelled "VLOG geprüft" will be prohibited only for the excluded sites/group members.</li> </ul>

### Table Z 5: Evaluation of audit results

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

# Z 3.11 Evaluation, Review by the Certification Body

Within the scope of the evaluation/review of the VLOG audit, the grading of the auditor in the completed checklist and the information indicated in the facility description will be re-checked by the certification body for completeness and plausibility. If relevant for the respective stage, the risk grading is also to be reviewed by the certification body and, if necessary, corrected and documented in the checklist. If there is a change in the risk grading or the audit results, the business shall be informed of this as quickly as possible.

The certification body is entitled to perform follow-up audits, audits on suspicion and additional checks.

The evaluator issues the certifier a recommendation regarding whether certification should be granted. If the evaluator and certifier are different people, the result of the evaluator must be documented separately.

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

### Z 3.11.1 Distribution of the Audit Report

The certification body shall issue an audit report to the business for every audit, including the deviations found and the audit results. In the case of a matrix or group organisation, the audit report is to be distributed to the group/or matrix members via the group/or matrix organiser or sent to them directly, depending on what has been determined.

# Z 4 Certificate Issuance

# Z 4.1 Prerequisites and Conditions for the Issuance of a Certificate

The following prerequisites must be met by the business for a certificate to be issued:

- Signed contract with a VLOG-recognised certification body
- Standard Usage Agreement with VLOG signed by both parties
  - Including VLOG ID or any VLOG sub-ID issued by VLOG
- Passed VLOG audit
  - Any corrective actions and implementation periods established have been cleared by the certification body

After passing an audit and taking into consideration Chapter Z 4.2, the certification body will issue the business with a certificate according to the VLOG Standard no later than 8 weeks after the audit. If the certificate is not issued within 8 weeks after the audit, a new routine audit is to be performed.

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

For group certifications and matrix certifications, the 8 weeks count as follows:

- for the initial certification: from the last audit necessary for the initial certification for a group/matrix member or group/matrix organiser (depending on which occurs later)
- for the follow-up certification: from the audit of the group/matrix organiser

# Z 4.2 Requirements for VLOG Certificates

VLOG certificates will be issued according to Annex (11). Layout deviations are permitted without approval by VLOG (except for the "Ohne GenTechnik" and "VLOG geprüft" seals).

### Area of application

The scope or scopes of applicability listed on the VLOG certificate is defined in accordance with Annex (12).

- If the scope of applicability relates to the production of eggs in individually or group certified agricultural businesses, the print numbers of the eggs for which the VLOG certificate applies must be included in an appendix to the certificate.
- If the scope of applicability concerns the Feed Manufacturing or Matrix Organisation Stage with the Mobile Grinding and Mixing Facilities Sub-stage, then the license plates of the VLOG-certified mobile grinding and mixing facilities will be listed in the scope of applicability of the VLOG certificate.

It is possible to specify the defined area of applicability in addition on the certificate (e.g. specific product information based on specific customer requests). Product-specific information (such as the brand names of feeds or other products) may not be named on the certificate but must be listed separately in an annex.

### Annex to the certificate

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

- Reference to the certificate, including specification of the unique certificate identification number
- Listing of the full name of the certified business
- The annex must be assigned a unique identifier
- The certificate must contain a reference to the annex, including specification of this unique identifier

# Z 4.3 Specific Requirements for Matrix and Group Organisations

### Z 4.3.1 Certificate

The following requirements must be met in addition to the requirements referred to in Chapters Z 4.1 and Z 4.2 when certificates are issued for matrix/group organisations:

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

The VLOG certificate shall be issued with the company name of the matrix organiser of the VLOG matrix.

Matrix members do not receive individual VLOG certificates.

The certification body shall also provide the matrix organiser with the list of sites, including the date of the last routine audit.

Explanation: "Ohne Gentechnik"/"VLOG geprüft" labelling of feed, raw materials and products at one site is only permissible if the site was reported to the certification body in accordance with the requirements of Chapter Z 2.2, the matrix organiser has performed the initial collection of data, if applicable, and the certification body has performed an audit at the site, if applicable, and the site has been approved by the certification body for the VLOG matrix.

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

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

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

Group members do not receive individual VLOG certificates.

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

**I** Explanation: "Ohne Gentechnik" labelling of food products of a group member is only permissible once this group member has been reported to the certification body in accordance with the requirements in Chapter Z 2.3 or Z 2.4, an initial collection of group member data has been done by the group organiser, an audit of the group member has been done by the certification body, if necessary, and the group member has been accepted by the certification body for the VLOG group.

### Table Z 6: Specific requirements for the issuance of certificates for matrix/group organisations

### Z 4.3.2 Confirmations for Matrix Members/Sites and Group Members

The certification body can issue the business a written confirmation indicating that it is part of a VLOG matrix/group organisation. The confirmation will state that it is valid only as long as the business is a member of the VLOG matrix/group and the matrix/group holds a valid certificate.

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

https://www.ohnegentechnik.org/fileadmin/user\_upload/01\_unternehmen/e\_standards/e1\_der\_vlog\_stan dard/Further\_Documents/VLOG\_confirmation\_for\_group\_and\_matrix\_members\_writeable.pdf

Explanation: The matrix/group organiser's permission is not necessary to issue the confirmation. However, it is recommended that the competent certification body inform the matrix/group organiser of the issuance of the confirmation.

# Z 4.4 Validity of the VLOG Certificate

### All stages

The validity period of the certificate extends until a new certificate is issued, but not later than the end of the following year (relative to the audit date).

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

### Logistics stage

VLOG-certified drop shippers simultaneously certified under the guidelines of the QS system:

If a drop shipper has a QS certification, the VLOG auditing interval can be adjusted to match the audit interval under QS controls (max. 2 years).

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

### Feed Manufacturing Stage

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

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

### Agriculture Stage

Individual VLOG-certified businesses:

• The validity of the VLOG individual certification is to be based on the audit interval according to Chapter Z 3.4 and may extend no longer than the end of the year in which the next routine audit must be performed at the latest. Therefore, the audit interval is dependent on the risk category of the business or the scope of application of the individual certification.

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

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

Table Z 7: Validity of the VLOG Certificate

### Z 4.5 Withdrawal of the Certificate

In the following cases the VLOG certificate will be withdrawn by the competent certification body:

• Termination (without a notice period) of the audit agreement before the end of the period of validity of the certificate

- Termination (without a notice period) of the Standard usage agreement before the end of the period of validity of the certificate
  - by the business
  - by VLOG
- Absence of a VLOG audit due to the issuance of at least one KO grading (cf. Table Z 5 (cf. chapter Z 3.10))
- Termination (without a notice period) of the certification body recognition agreement before the end of the period of validity of the certificate

# Z 4.6Transferring Certification in the Event of Change of<br/>Ownership, Certification Body or Group/Matrix Member

### Transferring Certification in the Event of Change of Ownership or Change of Business Name

If a change of ownership and/or change of business name occurs at a VLOG-certified business or site, VLOG certification may be transferred to the new business.

The following steps must be taken in this regard:

- 1. The previously VLOG-certified business gives the certification body permission to use the data for the new business.
- 2. The certification body undertakes VLOG certification of the new business on the basis of previously submitted audit documents; the period of validity of the updated VLOG certificate may not exceed that applicable to the previous certificate.
- 3. The certification body provides the updated certificate to VLOG as soon as possible.

If applicable, further requirements must be clarified with the responsible certification body.

For group or matrix certifications, the following additionally applies:

• The risk categories/grading and audit intervals for the group or matrix members remain the same.

### Transferring Certification in the Event of a Change of Certification Body

For a change of certification body, VLOG certification may be updated by the new certification body on the basis of the previous routine audit. This requires each the consent of the certified business as well as of the former and new certification bodies.

The following steps must be taken in this regard:

- 1. The VLOG-certified business declares its consent to the previous certification body for the data to be forwarded to the new certification body.
- 2. The previous certification body informs VLOG regarding the termination/cancellation of the contractual relationship with the VLOG-certified business.
- 3. The VLOG-certified business informs VLOG regarding the switch to a new certification body. VLOG updates the relevant information in the VLOG database.
- 4. Upon request by the new certification body, the previous certification body transfers the complete audit and certification documents from the most recent routine audit, and any follow-up audits, to the new certification body.
- 5. The new certification body may certify the business according to the VLOG Standard on the basis of the complete audit documents; the period of validity of the updated VLOG certificate may not exceed the period of validity of the previous certificate.

6. The new certification body sends the updated certificate and information regarding the recertification to VLOG.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.

For group or matrix certifications, the following additionally applies:

• The risk categories and audit intervals of the group-/matrix members will remain in effect. The change of certification body does not result in a repeated initial certification, but triggers a follow-up certification (cf. Chapter Z 2.2 or Z 2.3).

### Change of group/matrix member

If a group/matrix member changes to a different VLOG group/matrix, the member's most recent group/matrix audit can be recognised as an audit for the new group/matrix organisation. The risk categories and audit intervals of the group member/matrix site will remain in effect.

The following steps must be taken in this regard:

- 1. The previous group/matrix organiser declares its consent to the previous certification body for the data to be forwarded to the new certification body.
- 2. The previous certification body transfers all audit and certification documents from the most recent routine audit of the respective group/matrix member to the new certification body.
- 3. The new certification body checks which tasks were performed by the group/matrix organiser in the previous VLOG group/matrix and compares them to the new VLOG group/matrix and the responsibilities of the new group/matrix organiser.
- 4. The group/matrix member is removed from the previous group/matrix organiser's list of members or site list.
- 5. The new certification body can recognise the most recent group/matrix audit of the group/matrix member as an audit for the new group/matrix organisation based on the existing audit documents. In this case, the business/site can be included in the VLOG group/matrix without an additional audit.

If the certification is transferred, it must be ensured that any pending corrective actions are monitored by the new certification body if applicable.



# "Ohne Gentechnik" Production and Certification Standard Part B - Logistics

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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# Part B - Logistics

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

# **B1** Stage Definition and Mandatory Certification

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

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Sub-stage Tra	<b>nsport</b> : Transport means conveying goods from one plac	e to another.	
Feed/Food	<ul> <li>For transport of bulk "VLOG geprüft" feed and/or bulk VLOG-certified food/ingredients between VLOG-certified businesses, provided that at least one of the following conditions is met:</li> <li>Transport is <u>not</u> integrated into the risk management of a VLOG-certified business</li> <li>No agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the carrier and the certified business</li> </ul>	<ul> <li>For the transport of bulk "VLOG geprüft" feed and/or bulk VLOG-certified food (ingredients) between VLOG- certified businesses, provided that all of the following three conditions are met:</li> <li>Order placed by a VLOG-certified business</li> <li>Transport is integrated into the risk management of a VLOG-certified business. There is adequate proof of integration</li> <li>An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the carrier and the certified business. (cf. Chapter B 2.5)</li> </ul>	B 1 - B 2

Page 3

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
		For the transport of bagged/tamper resistant packaged "VLOG geprüft" feed and/or VLOG-certified food.	B 1 - B 2
		For the transport of bulk VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2
-		ary storage of food and/or feed. Handling comprises all serv , if applicable, as well as reloading of goods being transporte	-
Feed	For storage/handling of bulk "VLOG geprüft" feed	For storage/handling of bagged/tamper resistant packaged feed that is clearly labelled.	B 1 - B 3
Food	For storage/handling of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of contamination or tampering.	For storage/handling of bulk, VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 3
		For storage/handling of bagged/tamper resistant VLOG- certified food of animal origin that is clearly labelled.	
contrast to dro		selling and reselling goods that are not produced at one's ov bods. That means the trader takes responsibility for storage,	
Feed	For traders, that want to label bulk feed, that is already VLOG-certified, as "VLOG geprüft"* on the bills of lading.	For trading of bagged/tamper resistant packaged feed (except for private labelling).	B 1 - B 2, B 4

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	For traders, that want to convert non-VLOG-certified feed material into "VLOG geprüft" quality and label it as such*.		B 1 - B 2, B 4 resp. B 5, B 6
	For traders, that sack and label bulk "VLOG geprüft"* feed material, and that also want to designate it as "VLOG geprüft" on labels, declarations or bills of lading.		B 1 - B 2, B 4
	Mobile grinding and/or mixing facilities: Trading/sale of "VLOG geprüft" oil by a grinding and/or mixing facility, if this oil is used for dust control in the grinding and/or mixing facility and the grinding and/or mixing facility is not VLOG-certified.	Mobile grinding and/or mixing facilities: Trading/sale of "VLOG geprüft" oil by a grinding and/or mixing facility, if this oil is used for dust control in the grinding and/or mixing facility and the grinding and/or mixing facility is VLOG-certified.	B 1 - B 2, B 4
Food	For trading of bulk VLOG-certified food/ingredients of animal origin if they are not clearly labelled on the food/ingredient and/or there is a risk of contamination or tampering.	For trading of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2, B 4
	<ul> <li>For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that at least one of the following conditions is met:</li> <li>The trader issues delivery slips of its own for certified goods with the "VLOG" label</li> <li>The trader commissions non-VLOG-certified carriers or the transport site is <u>not</u> included in</li> </ul>	<ul> <li>For trading of sealed VLOG-certified food between two VLOG-certified businesses, provided that all of the following conditions are met:</li> <li>The goods are VLOG certified</li> <li>The originating processing business is listed on the delivery slips</li> <li>The certified goods are labelled "VLOG" on the delivery slip</li> </ul>	B 1 - B 2, B 4

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	the risk management of a VLOG-certified business	• The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1. There is adequate proof of integration.	
		• After loading, the vehicle tank, container, etc. is sealed	
		For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.	
		For trading of bagged/tamper resistant packaged food.	
customer of		wherein the goods are transported directly from the supplie possession of the goods, but has a contractual relationship	
Feed	For drop shipping of bulk "VLOG geprüft" feed	For drop shipping of bagged/tamper resistant packaged feed (except for private labelling).	B 1 - B 2, B 5
	For drop shippers, who want to convert non-VLOG- certified feed material into "VLOG geprüft" quality and label it as such*.		B 1 - B 2, B 5, B 6
Food	For drop shipping of bulk VLOG-certified food/ingredients.	For drop shipping of bulk VLOG-certified food/ingredients of animal origin, provided these foods of animal origin are clearly labelled and there is no risk of contamination or tampering.	B 1 - B 2, B 5

Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<ul> <li>For sealed drop shipping of VLOG-certified food between two VLOG-certified businesses, provided that at least one of the following conditions is met:</li> <li>The drop shipper issues delivery slips of its own for certified goods with the "VLOG" label</li> <li>The drop shipper commissions non-VLOG- certified carriers or the transport is not included in the risk management of the VLOG-certified business that commissions the transport</li> </ul>	<ul> <li>For drop shipping of sealed VLOG-certified food between two VLOG-certified food businesses, provided that all of the following conditions are met:</li> <li>The goods are VLOG certified</li> <li>The originating processing business is listed on the delivery slips</li> <li>The certified goods are labelled "VLOG" on the delivery slip</li> <li>The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1. There is adequate proof of integration.</li> <li>After loading, the vehicle tank, container, etc. is sealed by employees of the issuing processing business</li> </ul>	B 1 - B 2, B 5
<ul> <li>For drop shipping of bulk VLOG-certified food with direct transport from the VLOG-certified agricultural business to the VLOG-certified buyer (e.g., by milk tanker), provided that at least one of the following conditions is not met:</li> <li>The goods are <u>not</u> VLOG certified</li> <li>The purchasing processing facility <u>cannot</u> verify that the goods exclusively come from VLOG-certified businesses</li> </ul>	<ul> <li>For drop shipping of bulk VLOG-certified food with direct transport from the VLOG-certified agricultural business to the VLOG-certified buyer (e.g., by milk tanker), provided that all of the following conditions are met:</li> <li>The goods are VLOG certified</li> <li>The purchasing processing facility can verify, based on available information/documentation, that the goods exclusively come from VLOG-certified businesses (e.g., verifiable tour)</li> </ul>	B 1 - B 2, B 5

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements	
	• The processing facility does <u>not</u> have currently valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)	• The processing facility has currently valid VLOG certificates (or certificates in accordance with Chapter Z 4.3.2)		
• The carrier is <u>not</u> VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1.	• The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B 1. There is adequate proof of integration.			
		For drop shipping of bagged/tamper resistant packaged VLOG-certified food/ingredients (e.g., as soon as they have been packaged in end consumer packaging).		
by another bus	<b>Sub-stage Private labelling of feed</b> : Private labelling refers to the activities of a business (e.g. trader or drop shipper) that sells feed manufactured by another business under its own brand name or company name. The feed is either manufactured by another business on contract in accordance with the client's (private labeller) specifications or the goods are purchased from the-client and sold in the Private Labeller's name.			
Feed	For businesses, that operate as private labellers for bagged and/or bulk feed and market/label the feed as "VLOG geprüft"*.	For businesses that operate as private labellers for feed and do not market/label the feed as "VLOG geprüft".	B 1 - B 2, B 7	

Table B 1: Stage Definition and Mandatory Certification

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

# **B 2** General Requirements

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

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

# **B 2.2** Facility Description

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

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

Explanation: Information transmitted in electronic form will be accepted. For the audit, the current facility descriptions, annexes (VLOG templates or own documents with equivalent content) and documents listed therein are to be submitted to the auditor for viewing. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. The current facility description and the documents specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

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

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

# **B 2.3** Assignment of Responsibilities, Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

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

# B 2.4 Risk Management (KO)

### <u>Risk analysis</u>

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

The risk analysis at a minimum covers the following points:

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

### <u>Risk management</u>

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

# **B 2.5** Commissioning External Service Providers

External service providers may be commissioned for activities requiring certification in the areas of Feed Manufacturing, Transport, Storage, Handling and/or (drop) shipping (cf. B 1 Logistics, C1 Feed Manufacturing, G1 Food Processing/Preparation) under one of the following conditions:

- the external service provider is audited by the certification body in the course of the VLOG onsite audit of the client or
- the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent

### Auditing in the course of the VLOG Audit of the Client

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

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

### If the External Service Provider is certified

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

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

# B 2.6 Segregation of Goods Flows/Exclusion of Contamination (KO)

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

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

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

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

- Clarification of whether an incident has occurred (cf. Chapter B 2.12)
- Labelling of affected feed, raw materials and products
- Notification of customers/buyers and suppliers
- Error management

i

- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.

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

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

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

### Feed

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

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

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

"The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ..."

### <u>Food</u>

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

VLOG-certified raw materials and products must be clearly labelled on the bills of lading using the wording "VLOG" and/or the "Ohne GenTechnik" Seal.

It must be clearly evident to which raw material or product the labelling refers.

If no bills of lading are generated in specific systems (e.g. milk collection), a clear contractual regulation for the delivery must ensure the above-listed labelling.

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

# B 2.9 Traceability (KO)

The introduced/installed traceability system must guarantee that:

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

 ${f i}$  Explanation: For this purpose, the following data is to be determined, among others:

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

## **B 2.10** Complaint Management

A documented system must be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

### **B 2.11 Goods Recall**

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

# **B 2.12** Crisis Management (KO)

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

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

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

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

# **B 2.13** Corrective Action, Ongoing Improvement Process

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

The corrective actions must be implemented in due time, and their effectiveness must be checked within a reasonable period of time. Both are to be documented.

## **B 2.14** Documentation and Retention Period

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

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

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

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

# B 2.15 Staff Training

All staff members involved in the operating procedures of relevance to "VLOG geprüft" or "VLOG" labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction is to take place before they take up their activity as well as on an ongoing basis, at least once per calendar year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility and the instructors.

Explanation: The intensity of training varies depending on the staff member and is guided by the responsibility of the staff member for the proper flow of the "VLOG geprüft" or "VLOG" operating procedure.

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

# **B 2.16** Internal Audits

Each calendar year, the business must perform an internal audit that at a minimum covers the general and business specific Standard requirements of the Logistics Stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.

# **B 3** Specific Requirements for Storage and Handling

### **B 3.1** Incoming Goods Inspection (KO)

### Feed

The bills of lading or in the case of bagged goods the packaging are to be checked for the "VLOG geprüft" label and/or "VLOG geprüft" seal within the scope of incoming goods inspection. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.

### <u>Food</u>

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

# **B4** Specific Requirements for Trade

# B 4.1 Incoming Goods Inspection (KO)

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

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

# B 4.2 Sampling and Testing

Risk-based sampling and GMO testing of the feed and/or raw materials relevant for the "VLOG geprüft"/"VLOG" trade is to be performed in accordance with the following specifications.

### B 4.2.1 Sampling and Testing Plan

A written sampling and testing plan must be available that describes the sampling and testing procedure and that is implemented according to schedule.

The sampling and testing plan, in compliance with the requirements listed in Chapter B 4.2.2, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing

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

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

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

### B 4.2.2 Sampling and Commissioning a Laboratory

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

- Compound feed: at least 400 g, max. 1 kg
- Feed material/raw materials:
  - whole maize/corn kernels, soy beans or rapeseed/canola grains, among other: at least 3000 grains or approx. the respectively corresponding sample amount (maize/corn at least 1000 g; soy at least 700 g, rapeseed/canola at least 60 g)
  - o ground: at least 400 g, maximum 1 kg

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.

**1** Explanation: The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

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

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

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

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

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

### B 4.2.3 Frequency of Sampling and Testing

Each calendar year, the frequency of sampling and testing in the business must at least follow the specifications listed in Table B 2 and Table B 3.

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

### Trading of VLOG feed

List of VLOG products at the site			
List of all products at the site	Bulk "VLOG geprüft" feed	VLOG bagged goods	
No bulk feed subject to compulsory labelling at site	up to, including 10,000 t/year: 1 > 10,000 to 50,000 t/year: 2 > 50,000 to 100,000 t/year: 4 > 100,000 to 200,000 t/year: 6 > 200,000 to 300,000 t/year: 8 for every additional 100,000 t or part thereof: 2 additional	None	
Feed subject to compulsory labelling at site	up to, including 2,000 t/year: 1 > 2,000 to 5,000 t/year: 3 > 5,000 to 10.000 t/ year: 5 > 10,000 to 50,000 t/year: 10 > 50,000 to 100,000 t/year: 15 > 100,000 to 200,000 t/year: 20 > 200,000 to 300,000 t/year: 25 for every additional 100,000 t or part thereof: 5 additional	None	

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

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

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

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

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

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

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

#### B 4.2.4 Evaluation of Test Results

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

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

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

#### Feed:

Evaluation		Actions
GMO not ve	rifiable or < 0.1%	
Labelling compliant, permissible for VLOG- production		No action needed
≥ 0.1 % ≤ 0.9 % GMO		
Case-by- case evaluation	Can the GMO contamination be traced back to your own business? (e.g., dual use)	<u>Yes</u> : Check whether the actions taken (cf. Chapter B 2.4) are adequate and properly implemented. - If not, take further action in accordance with Chapters B 2.7 and B 2.12

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

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

#### Table B 4: Evaluation of test results for feed

#### Food:

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

Table B 5: Evaluation of test results for food

# **B 5** Specific Requirements for Drop Shipping

## B 5.1 Incoming Goods Inspection (KO)

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

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

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

## **B 6.1** Specific Requirements for Risk Management

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

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

*Explanation: To assist with the risk grading of feed, an "Assessment Aid – At Risk Feed" is available on the VLOG website: <u>https://www.ohnegentechnik.org/risk-prone\_feed</u>.* 

# B 6.2 Incoming Goods Inspection

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

Incoming goods inspection of risk prone feed

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

- a separate declaration of the GMO-free status of the currently delivered batch/lot or
- a test result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered or
- an additional indication on the bills of lading declaring the products to be exempt from labelling or
- a clear contractual regulation regarding the delivery of feed exempt from labelling

Explanation: VLOG recommends the following wording for the declaration of feed that is exempt from mandatory labelling but is not VLOG-certified: "The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ..."

Incoming goods inspection of non-risk-prone feed

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

## **B 6.3** Sampling and Testing for Conversion

The requirements of Chapter B 4.2 (B 4.2.1 Sampling and Testing Plan, B 4.2.2 Sampling and Commissioning a Laboratory, B 4.2.4 Evaluation of Test Results) are to be performed.

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

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

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

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

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

# **B7** Specific Requirements for Private Labelling of Feed

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

Contract manufacturers are monitored as follows:

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

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

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

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

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

#### B 7.3 Incoming Goods Inspection

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

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

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

## B 7.4 Sampling and Testing

If the private labeller (temporarily) takes physical possession of bulk goods, the "VLOG geprüft" feed must be subjected to risk-based sampling and GMO testing in accordance with Chapter B 4.2.



# "Ohne Gentechnik" Production and Certification Standard

# Part C - Feed Manufacturing

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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# Part C - Feed Manufacturing

This part of the Standard describes the requirements for the Feed Manufacturing Stage and its sub-stages. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

# C 1 Stage Definition and Mandatory Certification

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

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
-	Sub-stage Feed manufacturing/processing: All process steps that include feed processing, e.g. the manufacture of post-extraction rapeseed meal (generated as a by-product during oil extraction from rapeseed/canola), milling, desiccating, etc.		
Transport, sto	Conversion of feed material not subject to compulsory labelling present at the (production) site to "VLOG geprüft" quality and subsequent marketing. Transport, storage and handling of VLOG-certified feed material or compound feed manufactured, processed or converted at the (production) site. If a feed manufacturer also operates as a private labeller, the respective requirements of Part B must be met in addition to the requirements of Part C.		
All types of feed	For bulk and/or bagged/packaged feed, produced in the business, that intended to be advertised/labelled as "VLOG geprüft"*.	For bulk and/or bagged/packaged feed, produced in the business that is <u>not</u> intended to be advertised/labelled as "VLOG geprüft".	C 1 - C 3
Sub-stage Mo	Sub-stage Mobile grinding and mixing facility: Commercial, multi-operation production of feed using mobile equipment in agricultural businesses.		
Grinding/ mixing of feed	For the grinding and/or mixing of feed that is to be advertised/labelled as "VLOG mixture". Certification in this area also covers the trading/sale of oil used for dust control in the grinding and/or mixing facility.	For the grinding and/or mixing of feed that is <u>not</u> to be advertised/labelled as "VLOG mixture".	C 1- C 2, C 4

Transport, storage and handling as a service, trading and drop shipping (including conversion of feed, if any) as well as Private Labelling of feed are at the Logistics stage (Part B).

Table C 1: Stage definition and mandatory certification

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

# C 2 General Requirements

#### C 2.1 Standard Usage Agreement with VLOG

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

## C 2.2 Facility Description

The facility description (Annex (15) (Feed Manufacturing) or (17) (Mobile Grinding and/or Mixing Facilities)) is on file and up to date.

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

Explanation: Information transmitted in electronic form will be accepted. For the audit, the current facility descriptions, annexes (VLOG templates or own documents with equivalent content), documents listed therein and evaluation of test results are to be submitted to the auditor for viewing. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. The current facility description and the documents/information specified therein are be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

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

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

## C 2.3 Assignment of Responsibilities, Organisational Chart

A current organisational chart shows responsibilities and assigned substitute rules.

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

## C 2.4 Risk Management (KO)

#### <u>Risk analysis</u>

A documented risk analysis has been created for all relevant feed, procedures and processes, including risk evaluation for "VLOG geprüft" labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Feed and feed additives for the "VLOG geprüft" area (e.g., countries of origin)
- Risk grading of feed (risk-prone/not risk-prone)
- Handling of feed that meets the requirements for "VLOG geprüft" labelling and feed that does not meet the requirements for "VLOG geprüft" labelling
- Production processes and facility parameters
- Procedures for cleaning, information on previous cargo in the case of vehicles
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Explanation: To assist with the risk grading of feed, an "Assessment Aid – At Risk Feed" is available on the VLOG website: <u>https://www.ohnegentechnik.org/risk-prone\_feed</u>.

#### <u>Risk management</u>

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

## C 2.5 Commissioning External Service Providers

External service providers may be commissioned for activities requiring certification in the areas of Feed Manufacturing, Transport, Storage or Handling (cf. B 1 Logistics, C 1 Feed Manufacturing) under one of the following conditions:

- the external service provider is audited by the certification body in the course of the VLOG on-site audit of the client or
- the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent

#### Auditing in the course of the VLOG Audit of the Client

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

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

#### If the External Service Provider is certified

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

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

#### C 2.6 Incoming Goods Inspection

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for "VLOG geprüft" production and/or labelling.

#### Incoming goods inspection of VLOG-certified feed

- The incoming goods inspection checks that the bills of lading or in the case of bagged goods the packaging contain the "VLOG geprüft" label and/or the "VLOG geprüft" seal (see A 10.2). A complaint is to be issued to the supplier for an incomplete or ambiguous bill of lading.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

#### Incoming goods inspection of risk prone feed not certified by VLOG

There must exist a confirmation from the supplier that all feed and feed additives classified by the business as risk-prone (cf. Chapter C 2.4) are GMO-free or exempt from labelling. This can be achieved by:

- a separate declaration of the GMO-free status of the currently delivered batch/lot or
- a test result according to the requirements of the VLOG Standard proving the GMO-free status of the batch/lot being delivered or
- an additional indication on the bills of lading declaring the products to be exempt from labelling or
- a clear contractual regulation regarding the delivery of feed exempt from labelling

•

Explanation: VLOG recommends the following wording for the declaration of feed that is exempt from mandatory labelling but is not VLOG-certified: "The following feed is exempt from the labelling obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ..."

#### Incoming goods inspection of non-risk-prone feed not certified by VLOG

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

# C 2.7 Segregation of Goods Flows, Exclusion of Contaminations (KO)

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

## C 2.8 Handling of Non-Compliant Feed (KO)

01.09.2024

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

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

The responsibilities are to be defined in the procedure.

Feed test results are to be evaluated in accordance with Chapter C 3.1.4.

Explanation: Non-compliant feed must be identifiable, e.g. based on positive test results.

## C 2.9 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All "VLOG geprüft" feed present in the business/at the site can be clearly identified at all times.
- The goods flow of "VLOG geprüft" feed as well as quantity lists and evaluations can be generated within one working day to allow conclusions about the plausibility of the goods flows.

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

- Information on supplier and delivery date
- Quantity
- Batch formation, if applicable (including re-working)
- Information on delivery date and supplied customers

## C 2.10 Complaint Management

A documented system must be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These are to be evaluated in an appropriate manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

## C 2.11 Goods Recall

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

## C 2.12 Crisis Management (KO)

**i** Explanation: Incidents are defined on the incident sheet (cf. Annex (31)).

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

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

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

#### C 2.13 Corrective Action, Ongoing Improvement Process

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

The corrective actions must be implemented in due time, and their effectiveness must be checked within a reasonable period of time. Both are to be documented.

#### C 2.14 Documentation and Retention Period

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

All documents relating to the "VLOG geprüft" labelling process or labelling with the "VLOG geprüft" seal are to be retained for at least the following period, unless legal requirements provide a longer retention period:

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

**i** Explanation: Documents that must be retained are delivery slips/protocols, clearance certificates, production and goods flow records (including re-work), training documents etc. In accordance with the

<u>Guideline for Monitoring GMOs in Feed</u>, feed related documents (regarding GMO) must be retained for five years.

## C 2.15 Staff Training

All staff members involved in operating procedures of relevance to "VLOG geprüft" labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity and on an ongoing basis, at least once per calendar year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility and the instructors.

Explanation: The intensity of training varies depending on the staff member and is guided by the responsibility of the staff member for the proper flow of the "VLOG geprüft" operating procedure.

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

## C 2.16 Internal Audits

Each calendar year, the business must perform an internal audit that at a minimum covers the general and business-specific Standard requirements of the Feed Manufacturing Stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.

If the requirements for internal auditors cannot be met, e.g., due to the size of the business, an external auditor must be commissioned to perform the internal audit.

• Exception: An external counter-check can be waived for businesses with ≤ 1,000 tonnes of feed material produced per calendar year (based on dry weight) and for mobile grinding and mixing facilities.

# C 3 Specific Requirements for Feed Manufacturing/Processing

#### C 3.1 Sampling and Testing

Risk-based sampling and GMO testing of the feed relevant for the "VLOG geprüft" production or labelling is to be performed in accordance with the following specifications.

#### C 3.1.1 Sampling and Testing Plan

A written sampling and testing plan on the basis of the business-specific risk grading (cf. Chapter C 2.4) for feed in "VLOG geprüft" manufacturing must be available that describes the sampling and testing procedure and that is implemented according to schedule.

The sampling and testing plan, in compliance with the requirements listed in Chapter C 3.1.2 must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated • sampler, creation of bulk samples, creation of reference samples, sample size, final product sampling, sampling documentation, clear sample identification)
- Frequency and periodic distribution of sampling and GMO testing
- Description of the test procedure (commissioned laboratory, scope of testing cf. <u>Guideline</u> for Laboratories)

Sampling and GMO testing is not required if the utilised feed cannot be tested for genetic engineering for technical reasons. In this case the sampling and testing plan must provide for a risk analysis that concludes which feed does not need to be sampled or tested.

 ${f 1}$  Explanation: The VLOG homepage offers an assessment aid on the suitability of feed for testing: https://www.ohnegentechnik.org/gmo\_testing\_suitability.

#### C 3.1.2 Sampling and Commissioning a laboratory

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 ٠
- Feed material/raw materials •
  - whole maize/corn kernels, soy beans or rapeseed/canola grains, among other: at 0 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)
  - 0 ground: at least 400 g, maximum 1 kg

*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.

 ${f i}$  The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

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

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

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

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

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

#### C 3.1.3 **Frequency of Sampling and Testing**

Each calendar year, the frequency of sampling and testing in the business must at least follow the specifications listed in Table C 2.

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

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

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

#### C 3.1.4 Evaluation of Test Results

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

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.

Evaluation	Actions
GMO not verifiable or < 0.1%	

<sup>&</sup>lt;sup>1</sup> Sites that only produce feed material not subject to compulsory labelling can dispense with sampling/GMO testing feed material if corresponding test was performed at the incoming goods point

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

Evaluation		Actions
Labelling compliant, permissible for VLOG- production		No action needed
≥ 0.1 % ≤ 0.9	9 % GMO	
Case-by- case evaluation	Can the GMO contamination be traced back to your own production system? (e.g., dual production)	Yes: Check whether the actions taken (cf. Chapter C 2.4) are adequate and properly implemented. -If not, take further action in accordance with Chapters C 2.8 and C 2.12No: Inform suppliers.
	Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?	Yes: The actions taken (cf. Chapter C 2.4) 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 C 2.8 and C 2.12

Table C 3: Evaluation of Test Results feed

## C 3.2 Reference Samples

The business shall retain complete reference samples of all outgoing "VLOG geprüft" batches in suitable containers so it can draw conclusions as to the actual quality delivered, if necessary. The reference samples are retained for a period of time appropriate to the intended purpose and product perishability of the feed.

Explanation: This applies to both bulk feed and packaged feed.

## C 3.3 Outgoing Goods Inspection, Labelling on Bills of Lading

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

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

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Explanation: For the declaration of feed that is exempt from mandatory labelling but is not VLOG-certified, VLOG recommends the following wording: "The following feed is exempt from the labelling

obligation within the meaning of Regulation (EC) No. 1829/2003 on genetically modified food and feed and of Regulation (EC) No. 1830/2003: ..."

# C 4 Specific Requirements for Mobile Grinding and Mixing Facilities

#### C 4.1 Specific Measures to Eliminate Contaminations

According to Chapter C 2.7 measures must be defined, documented and implemented for each facility to prevent the carryover of GMO feed from previous mixtures during the production of "VLOG mixtures". Other risk factors such as the age of the facilities and repairs will be taken into account.

The proper facility operation has to be ensured. The facility must be cleaned in accordance with the business cleaning plan. Maintenance and cleaning are to be documented.

In grinding and mixing facilities that also process feed containing GMOs:

- at least one complete discharge and/or system purge must be performed following mixtures subject to compulsory labelling and before use in VLOG production depending on the type of facility and internal risk assessment.
- Regardless of the operator's risk assessment, a system purge must always be performed if more than 40 % of the previous mixture consisted of feed subject to compulsory labelling (based on total mixture weight). This is also required if a complete discharge has already been performed.
- the system purge must be performed in accordance with the manufacturer's instructions and with a sufficiently large quantity. It must be reasonably evident to the auditor that the batch size was adequate (e.g., using the manufacturer's information regarding carryover or the operator's own test results).
- the system purges must be used outside of VLOG production.
- the method of complete discharges and/or system purges must be clearly documented.
- the performance of the complete discharge and system purge must be documented in the mixing protocol in accordance with Chapter C 4.3 /Annex (30).

## C 4.2 Safeguarding with a Carryover Test

Explanation: It is not necessary to conduct carryover tests if the only feed ground/mixed in grinding and/or mixing facilities is feed not subject to mandatory labelling.

If feeds (including oils) subject to mandatory labelling are also ground/mixed, the operator of the grinding and/or mixing facility must conduct a carryover test for each identical model used, in order to validate the effectiveness of the measures taken to prevent carryover.

• Exception: For grinding and/or mixing facilities for which both a complete discharge and a system purge in accordance with the manufacturer's instructions (or based on the business' own test results) is performed after every mixing involving feed subject to mandatory labelling and before any "VLOG mixing", no carryover test is necessary.

If there are several technically identical models available in the facility, the test is to be conducted at the facility with the highest risk of carryover (e.g. measured by age or type/extent of repairs). The results of the carryover test conducted are to be documented and retained at least until the next test. The business must derive appropriate measures from the results, if necessary.

#### <u>Carryover Test upon Entry into VLOG Production:</u>

A carryover test must be conducted.

For brand new facilities the carryover test can be dispensed with, if a detailed system report from the manufacturer is presented, which provides evidence-based information on the specific carryovers resulting from each measure (complete discharge, use of a hammer mill, system purge of a certain size/quality, etc.).

#### **Carryover Tests in Subsequent Years:**

A carryover test must be performed at least every five calendar years or when there are material changes to the facility (repairs, wear and tear, defects...), which can affect the carryover.

#### C 4.3 Mixing Documentation and Mixing Protocols

The mixing sequence and the individual mixtures per facility are to be documented on a daily basis in chronological order. From the documentation it is must be evident which mixtures are those with feed that is subject to compulsory labelling and which ones are "VLOG mixtures".

For mixtures subject to compulsory labelling, the percentage of feed subject to compulsory labelling in the mixture must be indicated.

After finishing the mixture, each "VLOG mixture" is to be documented with two mixing protocols according to Annex (30) or an equivalent mixing protocol and countersigned by the facility operator. The facility operator and the client each receive a copy of the mixing protocol.

Explanation: The documentation of the mixing sequence and the individual mixes may also consist of individual grinding and mixing protocols.

## C 4.4 Sampling

#### C 4.4.1 Sampling Permission

The operator of mobile grinding and mixing facility must have written permission from each VLOG-certified agricultural business or agricultural VLOG group member.

This permission authorises the operator of the mobile grinding and mixing facility to sample the manufactured "VLOG mixture".

## C 4.5 Identification on Bills of Lading

VLOG-certified mixtures of feed not subject to mandatory labelling must be labelled on all bills of lading using the wording "VLOG mixture".



# "Ohne Gentechnik" Production and Certification Standard

# Part D - Matrix Organisation Logistics and Feed Manufacturing

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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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.

**1** 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)

#### <u>Risk analysis</u>

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. <u>Guideline for Laboratories</u>)

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.

**1** *Explanation: The VLOG homepage offers an assessment aid to determine the suitability raw materials and products for testing: <u>https://www.ohnegentechnik.org/gmo\_testing\_suitability</u>.* 

#### 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)
  - o ground: at least 400 g, maximum 1 kg

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

Explanation: The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

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

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

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

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

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

#### D 2.6.3 Frequency of Sampling and Testing

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

#### 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:

Evaluatio	'n	Actions			
GMO not verifiable or < 0.1%					
Labelling compliant, permissible for VLOG- production		No action needed			
≥ 0.1 % ≤ 0.9	9 % GMO				
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.			
		<ul> <li>If not, take further action in accordance with Chapters D 2.8 and D 2.11 (or corresponding chapter in part B or C).</li> </ul>			
		<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.			
		No (No systemic cause): No action needed.			
> 0.9 % GM	> 0.9 % GMO				
Not labelling compliant, not permissible for VLOG production		Take further action in accordance with the procedures established in Chapters D 2.8 and D 2.11 (or corresponding chapter in part B or C).			

Table D 2: Evaluation of test results for feed

#### Food:

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

#### Table D 3: Evaluation of test results for food

#### D 2.6.5 Evaluation of the analytical data

The matrix organiser:

- collects the test results of the matrix sites, and evaluates these at least once per calendar year. These evaluations must be conducted for each matrix site.
- 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): <u>https://www.ohnegentechnik.org/staff\_training</u>.

# 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 noncompliant 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 noncompliant 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.



# "Ohne Gentechnik" Production and Certification Standard Part E - Agriculture

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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

	Certification required according to VLOG Standard	Approval by document check and/or registration	Standard requirements
<b>Sub-stage of Animal p</b> aquaculture) before sla	<b>roduction</b> : The production of primary products of anim- ughter.	al origin, including milking and livestock production (i	ncluding
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:	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:	E 1 - E 4
	<ul> <li>Apiary: ≥ 50 beehives</li> </ul>	• Apiary: < 50 beehives	
	<ul> <li>Egg-producing operations: ≥ 350 animal spaces</li> </ul>	• Egg-producing operations: < 350 animal spaces	
	<ul> <li>Milk production: annually ≥ 10 cows</li> </ul>	<ul> <li>Milk production: annually &lt; 10 cows</li> </ul>	
		A document check is necessary.*	
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

	<ul> <li>"Ohne Gentechnik" compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:</li> <li>Rearing of laying hens: ≥ 700 animal spaces</li> </ul>	<ul> <li>"Ohne Gentechnik" compliant feed is to be applied to the minimum feeding conversion period, if they fulfil the following business sizes:</li> <li>Rearing of laying hens: &lt; 700 animal spaces A document check is necessary.*</li> </ul>	
<ul> <li>aforementioned primary producers and whose</li> <li>"Ohne Gentechnik" compliant feed is to be applied to</li> <li>the minimum feeding conversion period, if the</li> <li>following two requirements are fulfilled:</li> <li>The facility is not registered with VLOG as a piglet</li> <li>rearing facility and</li> <li>business fulfils the following business size:</li> <li>≥ 250 animal spaces for piglets under 30 kg</li> </ul>	<ul> <li>For agricultural businesses that sell piglets to the aforementioned primary producers and whose "Ohne Gentechnik" compliant feed is to be applied to the minimum feeding conversion period, if the following business size is fulfilled:</li> <li>&lt; 250 animal spaces for piglets under 30 kg A document check is necessary.*</li> </ul>	E 1 - E 4	
	<ul> <li>For agricultural businesses that sell piglets to the aforementioned primary producers and whose "Ohne Gentechnik" compliant feed is to be applied to the minimum feeding conversion period, if the following requirement is fulfilled:</li> <li>The facility is not registered with VLOG as a piglet rearing facility</li> </ul>	E 1 - E 4	
		Please contact the VLOG head office for information regarding registration.	

\* 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-ba	ased production: The cultivation of primary products, ir	ncluding 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).	
including loading, unlo	transport/livestock trade: Any movement of animals i bading, transloading and resting, until the completion of h livestock trader (temporarily) owns the animals.		
	For livestock trade with VLOG animals		E 1-E 3, E 6
	<ul> <li>For commercial animal transport of VLOG animals, provided that least one of the following three requirements is fulfilled:</li> <li>No commissioning by a VLOG certified business.</li> <li>Transport is <u>not</u> integrated into the risk management of the VLOG certified business.</li> </ul>	<ul> <li>For commercial animal transport, provided that all of the following three conditions are met:</li> <li>Commissioning by a VLOG certified business.</li> <li>Transport is integrated into the risk management of the VLOG certified business.</li> <li>An agreement is in effect between the carrier and the certified business regarding</li> </ul>	E 1-E 3, E 6

Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
• 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

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

#### <u>General</u>

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

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

<u>Grading a business with various areas of application</u> (e.g., cattle – cow's milk (raw) and cattle – livestock for fattening, cattle – cow's milk (raw) and pigs – fattening pigs):

If several areas of application in the business are part of a VLOG certification, risk grading is performed according to the following criteria:

- across all areas of application (one risk category per business and only the highest/strictest risk category shall apply) or
- separately for individual areas of application (one risk category per area of application) if the following conditions are met:
  - the areas of application are completely separate from each other (completely separate facilities/feeding equipment/machines in contact with feed), and
  - all grading criteria in the following table are observed for each area of application
  - these conditions being met, the different risk categories for the individual areas of application result in different audit intervals (cf. Chapter Z 3.4)

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<ul> <li>Only possible if all of the following criteria are met:</li> <li>No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site.</li> <li>Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit.</li> </ul>	Feed subject to compulsory labelling, which can be swapped, is present at the site. Grading in Risk Category 1 is only possible if installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling, which can be swapped, are completely segregated from the VLOG operating unit.	Following initial conversion to VLOG production (possibly time-lagged), feed subject to compulsory labelling, which can be swapped and is handled with the same installations/feeding equipment/machines used for VLOG feed manufacturing is present at the site <sup>1</sup> .
Switch of feed quality (subject to compulsory labelling and not subject to compulsory labelling) within the operating unit/in the VLOG barn	After the beginning of "Ohne Gentechnik" feeding, no switch to feeding with feed subject to compulsory labelling takes place in the VLOG operating unit/in the VLOG barn.		After initial conversion to "Ohne Gentechnik" feeding, feeding oscillates between "Ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling (e.g. in production systems involving animals whose lifespan is longer than the "Ohne Gentechnik" minimum feeding conversion period).
Certification status of risk-prone feed in VLOG production (cf. Chapter E 4.2)	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		Risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used.

<sup>&</sup>lt;sup>1</sup> This also includes the internal or external dual use of mixer vehicles for VLOG production.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
	equivalent. This also applies to oils used for dust binding in grinding and mixing facilities.		Risk-prone feed is being used that has been certified pursuant to the VLOG Standard but lost the certification status due to a violation of the certification obligations in the supply chain (cf. chapter B 1 or C 1).
Use of grinding and/or mixing facilities	Cooperatively used mobile grinding and/or mixing facilities are certified according to the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self- mixers exclusively process feed not subject to compulsory labelling.	<ul> <li>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.</li> <li>Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:</li> <li>The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT, Bio<sup>2</sup>).</li> <li>Measures to prevent contaminations with GMO are described in the QM manual of the facility operator.</li> </ul>	Mobile grinding and/or mixing facilities are not certified in accordance with the VLOG Standard. Stationary grinding and/or mixing facilities used by agricultural self- mixers process both feed subject to compulsory labelling and such that is not. Grading into Risk Category 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT).

<sup>&</sup>lt;sup>2</sup> Exception: If the VLOG farmer's organic-certified grinding and/or mixing facility of is used exclusively for organic-certified feed, the facility can be graded in Risk Category 0

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
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, du periods. In this case, the other risk-grad	ring transport, trans-shipment and rest ling 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.

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.

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

# E 3.3 Assignment of Responsibilities, Organisational Chart

There must be an up-to-date organisational chart that:

- describes the organisational structure and
- lists responsibilities and substitution rules.

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

In the case of small operations<sup>3</sup>, this may be done as part of the facility description.

<sup>&</sup>lt;sup>3</sup> For definition see Glossary

# E 3.4 Risk management

Explanation: If the facility description addresses all points of the risk analysis and the risk management, a separate risk analysis document will not be required.

#### **Risk analysis**

A documented risk analysis must be in place for all relevant facility-specific procedures and processes including assessment of the risks for "Ohne Gentechnik"/"VLOG" labelling.

The risk analysis must at a minimum cover the following points:

- Entry through feed subject to compulsory labelling
- Entry through feed from the grower's own cultivation
- 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

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.

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

Explanation: The severity of the infraction must be examined in each individual case by the respective certification bodies; it is influenced in particular by the following factors:

- The farmer was aware that the feed should have been labelled according to Regulations (EC) No. 1829/2003 and No. 1830/2003
- Lack of due diligence at reception of feed
- Quantity of the wrongly declared feed that was actually fed
- GMO portion in the feed
- Time during which the wrongly declared feed was fed

• Explanation: A legal opinion of the law firm [GGSC] on behalf of VLOG offers additional orientation for businesses and the certification bodies concerning the decision as to whether a new start is required. (Legal Opinion dated 23 November 2015: <u>https://www.ohnegentechnik.org/GGSC\_fuetterungsfrist</u>.

# 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

 ${f i}$  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)

*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 ٠
- 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.

#### **Corrective Action** E 3.10

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.

#### **Documentation and Retention Periods** E 3.11

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.

**1** 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.

#### **Staff Training** E 3.12

All staff involved in the operating procedure of the "VLOG" sector shall be trained concerning the requirements of the VLOG Standard and the operating procedures laid down therein. Training shall take place before they take up their activity as well as on a continuous basis at least once per calendar year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility, and the instructors.

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

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.

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

# 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	a, 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	
compound feed that contains maize/corn or was made from it.	Austria, Poland, Scotland, Switzerland, Slovenia, Hungary, Wales,	
	Dried maize/corn kernels if the following two conditions are met:	
	<ul> <li>verified cultivation of the maize/corn in the aforementioned countries</li> <li>Purchase made directly from a drying facility that only dries goods</li> </ul>	
	not subject to labelling and maize/corn from the aforementioned countries. A written confirmation is available.	
	<b>Maize/corn silage or silage maize/corn</b> if the following two conditions are met:	
	<ul> <li>verified cultivation of the maize/corn in the aforementioned countries</li> <li>Purchased utilising one of the following three options:</li> </ul>	
	<ul> <li>drop shipper with transport directly from the producer to customer without intermediate storage</li> </ul>	
	– Trader:	
	<ul> <li>only stores/trans-ships silage corn/maize or maize/corn silage from the aforementioned countries OR</li> <li>only trades producer-wrapped/shrink wrapped silage with delivery to the customer in this packaging</li> </ul>	
	A batch-specific certificate of origin/declaration by the drop shipper, trader or producer must be on file.	
Sugar Beets		
Feed material from sugar beets and compound feed that	Feed material from sugar beets and compound feed that contains sugar beets or was made from them in compliance with the following conditions:	
contains sugar beets or was made from them.	<ul> <li>cultivation and if applicable, processing, in the EU or Switzerland</li> <li>for each campaign, there is a meaningful confirmation from the producer that only non-labelled sugar beets are processed.</li> </ul>	

# E 4.3

# **3** Feed Ordering

Explanation: Non-risk-prone feed (cf. Chapter E 4.2, e.g. VLOG certified feed bearing the word mark and/or the seal "VLOG geprüft") may be used without written orders and/or additional contractual agreement.

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 businesses<sup>4</sup>, 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.

<sup>&</sup>lt;sup>4</sup> 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: <u>https://www.ohnegentechnik.org/SRAE</u>.

#### 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 <sup>5</sup>	ten weeks
Poultry for egg production	six weeks
Other animal species/categories	from the time of birth/hatching

#### Table E 4: Minimum feeding conversion period according to EGGenTDurchfG

<sup>&</sup>lt;sup>5</sup> The minimum feeding conversion period for poultry for meat production in the table given above is equivalent to a flat period of ten weeks prior to slaughter, not including the first three days of life.

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	<ul> <li>The pullet rearing facility</li> <li>is itself VLOG-certified or</li> <li>is certified according to a standard recognised as equivalent or</li> <li>is currently included in a VLOG group</li> </ul>	<ul> <li>VLOG-certificate or</li> <li>certificate under a standard recognised as equivalent or</li> <li>current proof of inclusion in a VLOG group and</li> <li>written confirmation of the start of the minimum feeding conversion period (e.g. via Annex (2) or on the delivery slip)</li> </ul>
Piglets	<ul> <li>The piglet rearing facility:</li> <li>is itself VLOG-certified or</li> <li>certified according to a standard recognised as equivalent or</li> <li>currently included in a VLOG group</li> <li>or</li> <li>VLOG-registered</li> </ul>	<ul> <li>VLOG-certificate or</li> <li>certificate under a standard recognised as equivalent or</li> <li>current proof of inclusion in a VLOG group or</li> <li>a VLOG registration certificate and</li> <li>written confirmation of the start of the minimum</li> </ul>

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

**1** 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):
    - o 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)

• 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:* <u>https://www.ohnegentechnik.org/gmo\_testing\_suitability</u>.

### 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 <u>each</u> switch to "Ohne Gentechnik"-compliant feeding, if there is a regular alternation between "Ohne Gentechnik"-compliant feeding and feeding with feed subject to mandatory labelling (e.g., turkey fattening) in a VLOG stable or associated feeding facility. The relevant sample must be taken at the start of the minimum feeding conversion period at the site of the feeding rack (e.g., the feeding trough).

Explanation: Sampling of bagged goods (incl. temper-resistant and sealed big bags) which are marked with the word mark and/or the seal "VLOG geprüft" seal or certified by a standard recognised as equivalent on delivery is not required.

#### Sampling:

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

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

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

Explanation: The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

#### **Retention of reference samples:**

The reference samples of the samples taken must be retained for at least two months. In addition, for each of the two relevant categories<sup>6</sup>, at least the three most recent reference samples must always be retained, even if they are more than two months old.

<sup>&</sup>lt;sup>6</sup> 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: <u>Annex 3 of Guideline for Laboratories</u> provides guidance regarding the order form, which contains all the minimum information that the laboratory must have to test VLOG samples.* 

#### E 4.11.4 Frequency of Testing

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

#### 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 <u>every</u> switching to "Ohne Gentechnik" feeding, if a VLOG operating unit/VLOG barn regularly switches between "Ohne Gentechnik" feeding and feeding with feed subject to compulsory labelling.
  - 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- certified <sup>7</sup>	Mobile grinding and/or mixing facility is not VLOG-certified	Stationary grinding and/or mixing facility (only for feed used within the farm)
Facility exclusively processes feed not subject to compulsory labelling	Sampling + testing not required		Sampling + testing not required
Facility also processes feed subject to compulsory labelling	Sampling + testing not required	One sample + one test per audit interval and facility	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 v	erifiable or < 0.1%	
Labelling c production	ompliant, permissible for VLOG-	No action needed
≥ 0.1 % to ≤	60.9 % 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.

<sup>&</sup>lt;sup>7</sup> 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	Yes: The actions taken (cf. Chapter E 3.4) are not adequate and must be revised.
	organisational level (in relation to the number of tests)?	<u>No</u> : (No systemic cause): No action needed.
> 0.9 % GM	0	
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 abovementioned 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.

i 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.



# "Ohne Gentechnik" Production and Certification Standard

# Part F - Group Organisation Agriculture

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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# **Part F - Group Organisation Agriculture**

The following part of the Standard describes the requirements for the group organisation agriculture, which is certified as part of group certification agriculture. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

# F 1 Stage Definition and Mandatory Certification

The requirements for the Agriculture Stage (Part E) must apply to agricultural group members. Additionally, the requirements in Part F must apply to the agricultural group organiser. The audits review whether all requirements have been met by the agricultural group organiser.

-	Itural group: A VLOG agricultural group is a combination of a		requirements	
	<b>-OG agricultural group</b> : A VLOG agricultural group is a combination of different businesses or sites (the so-called agricultural group members) fo e purpose of VLOG group certification in agriculture. Group certification is available for a business with at least two sites as well as for the join ertification of multiple businesses with their sites.			
covering agri VLOG group o	Agricultural group organiser, hereinafter group organiser: Businesses in a VLOG agricultural group having responsibility for a risk management covering agricultural group members and, for the production of food products of animal origin, also including PCR tests of the feed employed. In a /LOG group organisation agriculture, certification is done through the group organiser, i.e. the group organiser receives the certification for the VLOG agricultural group.			
1	For primary production of food of animal origin	For the production of plant-based raw materials (food).	F 1-F 2	
group. • A gro • If a gro may b • If a b				
	For the production and processing of food of animal origin.	For the production of plant-based food.	E1-E5	

#### Table F 1: Stage Definition and Mandatory Certification

# F 2 Requirements for Group Organisers

## F 2.1 Standard Usage Agreement with VLOG

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

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

## F 2.2.1 Group Description (see Annex (23))

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

The group description must contain/provide at least:

- A list of the group members and a full description of their activities
- A list and description of the outsourced processes (e.g. external service providers) which are integrated into the VLOG group, including the persons in charge and their contact data
- A list of all areas for which the group organiser is responsible (e.g. *risk management, self-monitoring of the agricultural businesses, sampling, testing, etc.*)
- The persons in charge of group organisation for the group organiser, including their contact data
- The basis used for the initial VLOG certification and the approval of additional group members in the future (100 %- or 25 %-process)
- If applicable, if multiple certification bodies have been engaged, the group organiser must describe the scope of certification of the various certification bodies (e.g. which certification body will audit which group members/member groups)

## F 2.2.2 Members list (see Annex (23a)/(23b))

A complete members list in accordance with Annex (23a) or, for laying hens, Annex (23b) is to be on file and up to date.

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

The group organiser must send the current, reduced list of members to VLOG as an Excel file<sup>1</sup> during the period between 01 January and 31 March of every calendar (only the data in the area labelled "Data transfer 1x per calendar year to VLOG").

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

<sup>&</sup>lt;sup>1</sup> Or a compatible format coordinated with VLOG

### F 2.2.3 Stable space overview (see Annex (23c))

Up to and including 2025: The group organiser must send a complete stable space overview for group members in accordance with Annex (23c) as Excel file to VLOG between 01 January and 31 March of each calendar year.

- The first transmission must be made between 01 January and 31 March 2023 based on the data available from facility descriptions or databases
- Transmissions starting in 2024: The stable space overview for all group members must be updated at least with respect to the stable spaces for group members that underwent a VLOG initial or routine audit during the previous year.

## F 2.2.4 Facility Description (see Annex (20a)/(20b)/(20c))

The group organiser is responsible for the facility descriptions of the group members and for keeping them up to date. Updated facility descriptions must be available at the facilities of group members. The group organiser must promptly notify certification body of internal changes in the business pertaining to the certification.

Explanation: In individual cases/if there are incidents, anonymised facility descriptions and checklists can be disclosed to VLOG following consultation between the group organiser and the certification body.

Explanation: Major changes pertaining to VLOG certification include, e.g. change of risk category.

Explanation: A group-specific facility description can be created if all the relevant content of the VLOG facility descriptions is included and this is checked by the competent certification bodies.

# F 2.3 Contractual Binding of the Group Members (KO)

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

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

### F 2.3.1 Data Release Statement (only Laying Hens – Eggs Group Organisation)

The contract or participation statement between the group member (egg producer) and the group organiser must contain a data release statement in accordance with Annex (23e) or be supplemented by it.

i

Explanation: With the data release statement, the laying facility permits the disclosure of data regarding VLOG-certified print numbers to VLOG.

# F 2.4 Risk Management (KO)

#### <u>Risk analysis</u>

A documented risk analysis must be submitted for all relevant feed, products, animals, procedures and processes for which the group organiser is responsible. The risk analysis must contain the assessment of risks affecting "VLOG" labelling or labelling with the "Ohne GenTechnik" seal.

The risk analysis at a minimum covers the following points:

- Animals and feed for the "Ohne Gentechnik"/"VLOG" area
- Handling of feed, animals and products that meet the requirements for "VLOG" labelling or labelling with the "Ohne GenTechnik" seal and those that do not meet the requirements for "VLOG" labelling or labelling with the "Ohne GenTechnik" seal
- Production processes and facility parameters
- Procedures for cleaning, inspection of the loading process, previous cargo in the case of vehicles
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

#### <u>Risk management</u>

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

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

# F 2.5 Commissioning External Service Providers

External service providers may be commissioned for activities requiring certification in the areas of production, transport, storage, handling and/or (drop) shipping (cf. Chapter B 1 Logistics, E 1 Agriculture, G 1 Food Processing/-Preparation), under one of the following conditions:

- the external service provider is audited by the certification body in the course of the VLOG on-site audit of the client or
- the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent.

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

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

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

#### If the External Service Provider is certified

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

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

#### F 2.6 Sampling and Testing

#### F 2.6.1 **Sampling and Testing Plan**

The group organiser is responsible for creating and implementing a sampling and testing plan for the group members that defines the risk-based sampling and GMO testing of feed.

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

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

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

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

Explanation: The VLOG homepage offers an assessment aid to determine the suitability of feed, raw materials and products for testing: https://www.ohnegentechnik.org/gmo\_testing\_suitability.

#### F 2.6.2 Sampling and Commissioning a Laboratory

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

- 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 0 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)
  - o 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.

 ${f i}$  The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

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

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

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

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

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

#### Frequency of Sampling and Testing F 2.6.3

At least the samplings and tests required by Chapter E 4.11 must be conducted for each agricultural group member within the respective audit interval.

#### **Evaluation of Test Results** F 2.6.4

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

Grading		Actions	
≥ 0.1 % ≤ 0.9	9 % GMO		
Case-by- caseCan the GMO contamination be traced back to your own production system? (e.g., dual production or change of feed)Are relevant values regularly detected at the respective organisational level (in relation to the number of tests)?		Yes: Check whether the actions taken (cf. Chapter F 2.4/E 3.4) are adequate and properly implemented. - <u>If not</u> , take further action in accordance with Chapters F 2.8 and F 2.10 (or the relevant chapter in Part E) <u>No</u> : Inform suppliers.	
		Yes: The actions taken (cf. Chapter F 2.4/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 F 2.8 and F 2.10 (or the relevant chapter in Part E)	

#### Table F 2: Evaluation of Test Results

#### F 2.6.5 Evaluation of the analytical data

The group organiser:

- collects the test results of the group members, and evaluates these at least once per calendar year. There must exist an evaluation per group member if there is more than one test result.
- defines risk-based measures (e.g. supplier evaluation) for the group members as applicable.

#### F 2.6.6 Disclosure of test results to VLOG

Up to and including 2025: The group organiser must send a full analysis/overview of the test results in accordance with Annex (23d) as Excel file to VLOG between 01 January and 31 March of each calendar year.

#### F 2.6.7 Reduction of the Scope of Testing after Changing Feed

If the group member regularly switches from "Ohne Gentechnik" feeding to feeding with feed subject to compulsory labelling and participates in the VLOG system via a group organiser, the scope of testing may be reduced under the conditions explained below.

The reduction refers exclusively to testing after feed switching. The number of tests required for incoming goods or when using grinding and mixing facilities must not be reduced.

Before the scope of testing can be reduced, the functionality of the switching system must be documented by the group organiser:

- At least one test result from switching must be available for each site with regular feed switching. The test results must come from a current feeding system and meet the requirements of the current VLOG Standard.
- After receiving the test results and, if necessary, other documents, the certification body will decide whether the group may claim the reduced scope of testing. The decision must be documented.

The switching system must be continuously validated:

- At least one test after each feed switching must be carried out each calendar year in at least 25 % of the sites with regular feed switching.
- At least one sample must be taken and analysed each calendar year by a VLOG certification body from at least 5 % of the sites with regular feed switching after such feed switching has been carried out. These tests can be counted towards the 25 %.
- Each switching, including any measures taken to avoid contaminations must be documented in writing.
- In the event of positive test results, the certification body (if necessary, upon agreement with VLOG) will decide in each individual case whether an individual business or the entire group may continue to use the reduced scope of testing.

If new farms/sites for which the scope of testing is also to be reduced are included in the group, at least one test result from the feed change must be submitted per new site.

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

## F 2.7 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.

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

# F 2.8 Handling of Non-compliant Feed, Products and Animals (KO)

The group organiser must establish an effective and documented procedure handling noncompliant feed, products and animals. At a minimum, it must include the following points:

- Clarification of whether an incident has occurred (cf. Chapter F 2.10)
- Labelling of the affected feed, products and animals

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

The responsibilities are to be defined in the procedure.

Feed test results are to be evaluated in accordance with Chapter F 2.6.4

i Explanation: Non-compliant feed must be identifiable, e.g. based on positive test results.

## F 2.9 Complaint Management

A documented system must be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These shall be evaluated in a suitable manner. Corrective actions (including determination of responsibilities and deadlines) are to be coordinated with the affected group members and initiated for justified complaints and feedback.

## F 2.10 Crisis Management (KO)

i Explanation: Incidents are defined on the incident sheet (cf. Annex (34)).

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

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

- The steps to follow in the event of an incident
- Assigned persons in charge including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Regulation for the immediate notification of:
  - affected business partners and customers
  - the certification body using the VLOG Incident Sheet (cf. Annex (34))
  - the VLOG Head Office using the VLOG Incident Sheet (cf. Annex (34))
- Legal advice (if required)

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

### F 2.11 Corrective Action, Ongoing Improvement Process

If non-compliant feed, products or animals are identified within the scope of internal audits, external audits or complaint management and/or lead to the identification of deviations from Standard requirements, the group organiser, if applicable together with the group members, must take and document corrective actions to prevent their reoccurrence.

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

## F 2.12 Documentation and Retention Periods

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

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

# F 2.13 Internal Audits

The group organiser must perform at least one internal audit per calendar year, which covers all the requirements under the Standard for the group organisation stage. The internal auditors have to have the corresponding expertise and may not audit their own activities. The results are to be documented in writing and communicated to the affected units.



# "Ohne Gentechnik" Production and Certification Standard

# **Part G - Food Processing/Preparation**

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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# Part G - Food Processing/Preparation

This part of the Standard describes the requirements for the Food Processing/Preparation Stage. Part Z (Certification) describes the certification process, risk grading and the resulting requirements for (future) VLOG-certified businesses.

# G 1 Stage Definition and Mandatory Certification

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

	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<ul> <li>Food preparation: Preparation comprises sorting and labelling unprocessed products under Regulation (EC) No. 852/2004 as well as the activities referred to in Art. 2 (1) n) of Regulation (EC) No. 852/2004 and slaughter of animals.</li> <li>Food processing: Processing comprises a significant change in the original food, e.g. through heating, smoking, curing, aging, desiccating, marinating, extracting, extruding, filtrating or a combination of these various processes (Regulation (EC) No. 852/2004).</li> </ul>			
Food of animal origin/ingredients	For processing/preparing/packaging products of animal origin up to the Packaging Stage in end consumer packaging whenever products of animal origin are to be labelled as "VLOG" or with the "Ohne GenTechnik" seal. For the retail trade, whenever preparation occurs in outlets, and bulk goods of animal origin are to be labelled with the "Ohne GenTechnik" seal (Part H: Retail - Sale of bulk food of animal origin).	No relevant areas	G 1 - G 2 Н 1- Н 2
Plant-based food/ingredients	For plant-based products which are to be labelled as "VLOG" or with the "Ohne GenTechnik" seal up to the Packaging Stage in end consumer packaging.	For plant-based products which are not to be labelled as "VLOG" or with the "Ohne GenTechnik" seal.	G 1 - G 3

Certification required		Certification not required	Standard
according to VLOG Standard		according to VLOG Standard	requirements
Transport, Storage and Trans-shipment as a service and Food Retailing are at the Logistics stage (cf. Part B).			

Table G 1: Stage Definition and Mandatory Certification

#### **G** 2 **General Requirements**

#### Standard Usage Agreement with VLOG G 2.1

There is a Standard Usage Agreement with VLOG signed by both parties, including the VLOG ID (10xxxxx/80-xxxxx) issued by VLOG. A VLOG sub-ID (10-xxxxx-A/B, etc.) is required for all sites that are included in the VLOG-certification and are legally dependent of the main site.

#### **Facility Description** G 2.2

The facility description (Annex (25)) is on file and up-to-date.

The certification body is to be promptly informed about major changes pertaining to the VLOG certification.

i Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes (VLOG templates or own documents with equivalent content), and documents and tests listed therein must be submitted to the auditor for review. At the request of the business, all documentation other than the facility description and documents/information mentioned therein may remain on the business premises in order to maintain confidentiality. The auditor must have reviewed the documents. The up-to-date facility description and the documents specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

 ${f i}$  Explanation: Major changes pertaining to the certification are, e.g., changes in risk category, products and/or processes.

 ${f 1}$  Explanation: If a new version of the facility description is published, the previous version of the facility description filled out by the business can still be used if there are no substantive differences or supplements to the subsequent version. If the new version of the facility description contains substantive differences/supplements, either a new facility description must be filled out or the relevant items in the old description must be supplemented. In so doing, clarity and transparency must be maintained.

#### Assignment of Responsibilities, Organisational Chart G 2.3

A current organisational chart shows responsibilities and assigned substitute rules.

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

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

#### **Risk analysis**

A documented risk analysis must be established for all relevant raw materials, products, procedures and processes, including risk assessment for "Ohne Gentechnik"/"VLOG" labelling (analogous to the HACCP concept).

The risk analysis at a minimum covers the following points:

- Raw materials and products (including additives, enzymes, microorganism cultures, processing aids and substances within the meaning of Sec. 3 EGGenTDurchfG) for the "Ohne Gentechnik"/"VLOG" area (e.g. countries of origin)
- Handling of raw materials/products for which "Ohne Gentechnik"/"VLOG" labelling would be permissible, and raw materials/products that do not meet the requirements for "Ohne Gentechnik"/"VLOG" labelling
- Production processes and facility parameters
- Procedures for cleaning, previous cargo in the case of vehicles
- Suppliers and external service providers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

#### <u>Risk management</u>

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

## G 2.5 Commissioning External Service Providers

External service providers may be commissioned for activities requiring certification (cf. Chapter B 1 Logistics, G 1 Food Processing/Preparation) in the areas of food processing/preparation, transport, storage, handling and/or shipping under one of the following conditions:

- the external service provider is audited by the certification body in the course of the VLOG on-site audit of the client or
- the external service provider is certified according to the VLOG Standard or a standard recognised as equivalent

#### Auditing in the course of the VLOG Audit of the Client

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

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

#### If the External Service Provider is certified

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

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

## G 2.6 Incoming Goods Inspection (KO)

With regard to incoming goods, it must be ensured that all "Ohne Gentechnik"/"VLOG" raw materials and products meet the requirements (cf. Chapter A 8.1, A 8.2 and A 8.4).

If, for systemic reasons, no delivery slips/shipping documents are prepared (e.g. milk collection), there must be a clear contractual provision regarding delivery.

#### Incoming goods inspection of animal raw materials/products:

A certification according to the VLOG Standard must exist for all raw materials and products of animal origin used<sup>1</sup>.

- 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.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification.

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

For all raw materials of non-animal origin, the supplier must submit:

• a GMO-Free Certificate or exemption from labelling according to Annex (1).

The business is to verify once per calendar year, in an expedient manner, whether the certification in the issued form is still valid and whether the specification for the article remains unchanged.

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

- 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 processing. A complaint is to be issued to the supplier for incomplete or ambiguous bills of lading.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once per calendar year.

a

Explanation: For the labelling of non-VLOG-certified raw materials/products that meet the requirements of EGGenTDurchfG and the VLOG Standard, VLOG recommends the following wording on the bills of lading: "Ingredient suitable for the production of "Ohne Gentechnik"-labelled food."

# G 2.7 Segregation of Goods Flows, Exclusion of Contamination (KO)

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

In addition, all raw materials/semi-finished products/finished products must be clearly and consistently labelled on all process steps.

<sup>&</sup>lt;sup>1</sup> Honey or other apiculture products that are not certified under the VLOG Standard or Council Regulation (EU) 2018/848 may be processed into "VLOG" food if evidence can be provided that no GMOs are cultivated or released within a circumference of 10 km from the apiaries or, alternatively, that there is an analytical result for a batch that was assessed pursuant to VLOG specifications and that shows no genetic modification.

If animals are fed in slaughterhouses (e.g. due to longer wait times) it is to be ensured that the utilised feed is not subject to compulsory labelling according to Regulation (EC) No. 1829/2003 or 1830/2003.

# G 2.8 Handling of Non-compliant Raw Materials/Products (KO)

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

At a minimum, it must include the following points:

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

The responsibilities are to be defined in the procedure.

Test results are to be evaluated in accordance with Chapter G 3.1.4.

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

# G 2.9 Outgoing Goods Inspection, Labelling on Bills of Lading (KO)

**1** Explanation: Bills of lading for VLOG-certified products in end consumer packaging need not be marked "VLOG" and/or to be labelled with the "Ohne GenTechnik" seal.

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

VLOG-certified raw materials and products must be clearly labelled on the bills of lading or in the case of bagged goods, on the packaging, using the wording "VLOG" and/or the "Ohne GenTechnik" seal (cf. Chapter A 10.1). It must be clearly evident to which raw materials/products the labelling refers.

If no bills of lading are produced due to the nature of the system (e.g. milk collection), an unequivocal contractual regulation is to be made concerning delivery which ensures the abovementioned labelling.

Explanation: For the labelling of non-VLOG-certified raw materials/products that meet the requirements of EGGenTDurchfG and the VLOG Standard, VLOG recommends the following wording on the bills of lading: "Ingredient suitable for the production of "Ohne Gentechnik"-labelled food."

## G 2.10 Traceability (KO)

The introduced/installed traceability system must guarantee that:

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

 ${f i}$  Explanation: For this purpose, the following data is to be determined, among others:

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

#### G 2.11 **Complaint Management**

A documented system is to be introduced to deal with complaints, feedback and comments associated with the requirements of the VLOG Standard. These shall be evaluated in a suitable manner. Corrective actions (including determination of responsibilities and deadlines) are to be initiated for justified complaints and feedback.

### G 2.12 Goods Recall

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

### G 2.13 Crisis Management (KO)

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

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

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

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

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

# G 2.14 Corrective Action, Ongoing Improvement Process

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

# G 2.15 Documentation and Retention Period

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

All documents relating to "Ohne Gentechnik"/"VLOG" labelling or labelling with the "Ohne GenTechnik" seal must be retained for at least the following period, unless statutory provisions require a longer retention period:

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

Explanation: Documents that must be retained include bills of lading, clearance certification, records of production and goods flows (including reworking), training documents, etc.

# G 2.16 Staff Training

All staff members involved in operating procedures of relevance to "VLOG" labelling, including vehicle operators, must be instructed in the requirements of the VLOG-Standard and the operating procedures laid down for this purpose. Instruction must take place before they take up their activity as well as on an ongoing basis, at least once per calendar year.

Training sessions must be documented regarding their content, their participants, as well as the training date, the training facility and the instructors.

Explanation: The intensity of training varies depending on the staff member and is to be oriented towards the responsibility of the staff member for the proper flow of the "VLOG" operating procedure.

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

# G 2.17 Internal Audits

The business must perform at least one internal audit per calendar year that at a minimum covers the general and business specific Standard requirements of the Food Processing/Food Preparation

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

# G 3 Specific Requirements for Plant-Based Raw Materials, Honey and Salmon

# G 3.1 Sampling and Testing

Risk-based sampling and GMO testing of raw materials and products relevant for "Ohne Gentechnik"/"VLOG" production is to be performed according to the following statements.

### G 3.1.1 Sampling and Testing Plan

A written sampling and testing plan must be available that describes the sampling and testing procedure and that is implemented according to schedule.

The sampling and testing plan, in compliance with the requirements listed in Chapter G 3.1.2, must at a minimum contain/define the following:

- Description of the sampling procedure (type of samples, sampling locations, designated sampler, creation of reference samples, sample size, sampling documentation, clear sample identification)
- Frequency and periods of sampling and GMO testing
- Description of the test procedure (commissioned laboratory, scope of testing cf. Guideline for Laboratories)

Sampling and GMO testing are not necessary or can be reduced if the genetic modifications of the raw materials and products used cannot be tested, either for technical reasons or if they are not risk-prone.

In this case, there must be a risk analysis to create a sampling and testing plan that draws conclusions as to which raw materials and products need not be sampled and tested or may be sampled and tested to a reduced extent. This risk analysis must include at least the following criteria for all raw materials/products used in VLOG production:

- Country of origin for raw material/product
- GMO cultivation authorisation (globally and in country of origin)
- Cross-contamination
- Suitability for testing of the raw material/product
- Contamination during transport, storage and processing
- Certification status of the raw material/product (e.g. VLOG or a standard recognised as equivalent)

Explanation: The VLOG homepage offers an assessment aid to determine the suitability of raw materials for testing: <u>https://www.ohnegentechnik.org/gmo\_testing\_suitability</u>.

#### G 3.1.2 Sampling and Commissioning a Laboratory

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

- Raw materials (whole maize/corn kernels, soy beans or rapeseed/canola grains, rice, 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, rice at least 500g)
- Honey at least 200 g
- Salmon filet: at least 5 g each from at least 10 animals
- Salmon products: at least 50 g

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

**i** Explanation: The minimum quantities of other raw materials not mentioned in this Chapter to be drawn are to be agreed upon with the commissioned laboratory.

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

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

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

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

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

#### G 3.1.3 Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in table G 2 each calendar year, at minimum.

All samples to be tested must be quickly sent to a VLOG-recognised laboratory.

Based on the risk analysis produced in accordance with Chapter G 3.1.1, the business determines the scope for reducing sampling and testing frequency.

The certification body reviews and approves the reduction of sampling and testing frequency on the basis of the risk analysis. The respective decision must be documented. In addition, the certification body must notify VLOG of approved reductions and will submit the risk analysis upon which the reduction is based on request by VLOG.

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

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

The sampling and testing frequencies set forth in Table G 3 must be complied with in each calendar year for products that contain rice or salmon as the main ingredient and are labelled with the "Ohne GenTechnik" seal. These samplings and tests can be counted towards the minimum number of samplings and tests listed in Table G 2.

Specific Raw Material	Area	Minimum number of samples + tests at "Ohne Gentechnik" incoming goods per calendar year	samples + tests at "Ohne Gentechnik"
Rice	Europe	6	
	Asia	Each batch	4 <sup>3</sup>
	Non-European and non-Asian	12	
Raw good salmon and salmon products	Europe (incl. Norway)	6	
	North America	Each batch	

Table G 3: Minimum number of samples + tests per calendar year for rice, salmon and salmon products

**1** Explanation: The number of samples may be correspondingly reduced if the number of lots received in the audit period is smaller than the minimum number of samples listed in Table G 2.

*Furthermore, batch-related test results from a VLOG-recognised laboratory can be counted towards meeting the minimum number of samples.* 

Explanation: Raw materials/products that are certified according to VLOG or another standard recognised as equivalent do not need to be sampled and tested.

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

<sup>&</sup>lt;sup>3</sup>This applies to processed rice (e.g. polished or hydrothermally treated rice (e.g. par-boiled rice), rice semolina, rice flour, etc.) and processed rice products (e.g. rice cakes) that are to be labelled with the "Ohne GenTechnik" seal.

### G 3.1.4 Evaluation of Test Results

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

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

Table G 4: Evaluation of Test Results



# "Ohne Gentechnik" Production and Certification Standard

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

Version 25.01

Published on 1 September 2024 Obligatory as of 1 January 2025



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01.09.2024

# 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: Handl	<b>Retail</b> : Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.				
_	<b>VLOG retail group</b> : 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.				
<b>Retail group organiser, hereinafter group organiser</b> : Business in a VLOG retail group having responsibility for a risk management that includes the retail group members. In VLOG retail group certification, certification is to be issued through the retail group organiser, i.e. the group organiser receives the certification for the VLOG retail group.					
Retail group 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 counter<sup>1</sup>
- A list and description of the outsourced processes (e.g. external service/job order production), which are integrated into the VLOG group, including the persons in charge and their contact data
- A list of all areas for which the group organiser is responsible (e.g. *risk management, crisis management, etc.*)
- 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.

<sup>&</sup>lt;sup>1</sup> If, for example, counter staff make incorrect PLU entries at checkout at a particular branch, traceability can only be ensured up until the service counter.

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)

#### <u>Risk analysis</u>

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

#### <u>Risk management</u>

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.

• 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.

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

# 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

 ${f i}$  Explanation: For this purpose, the following data is to be determined, among others:

- Information on supplier and delivery date
- Quantity
- Creation of batches, if applicable (including re-working)
- Information on delivery date and supplied customers<sup>2</sup>

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

# H 2.13 Crisis Management (KO)

**i** 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))

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

- 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.

G

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

# H 2.16 Internal Audits

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

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

The following additional points are to be checked:

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

# Annexes

#### **Part 1 Suppliers' Declarations**

- (1) GMO-Free Certificate
- (2) Certificate for "Ohne Gentechnik" Compliant Feeding of Animals
- (3) Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)

#### **Part 2 Analytics**

- (4) Sampling Log
- (5) repealed
- (6) repealed

#### (7) Reduction of the Scope of Testing after Changing Feed in Group Organisations

#### **Part 3 Certification**

- (8) repealed
- (9) repealed
- (10) repealed
- (11) VLOG Certificate Template
- (12) Areas of Application of VLOG Certification

#### Part 4 Audit Documents

- (13) Facility Description Logistics
- (14) Checklist Logistics
- (15) Facility Description Feed Manufacturing
- (16) Checklist Feed Manufacturing
- (17) Facility Description Mobile Grinding and Mixing Facilities
- (18) Matrix Description and List of Sites
- (19) Checklist Matrix Organisation
- (20a) Facility Description Agriculture
- (20b) Facility Description Agriculture Beekeepers
- (20c) Facility Description Animal Transport/Livestock Trade
- (21) repealed
- (22a) Checklist Agriculture including Beekeepers
- (22b) Checklist Animal Transport and Livestock Trade
- (23) Group Description Agriculture including Members List
  - (23a) Members List
  - (23b) Members Lists laying hens
  - (23c) Transmission of Stable Spaces
  - (23d) Evaluation/Overview Test Results
  - (23e) Data Release Statement
- (24) Checklist Group Organisation
- (25) Facility Description Food Processing/-Preparation
- (26) Checklist Food Processing/-Preparation
- (27) Group Description Retail Bulk Goods
- (28) Checklist Retail Bulk Goods (Headquarters)
- (29) Checklist Retail Bulk goods (Branch)

#### **Part 5 Protocols and Confirmations**

- (30) Grinding and Mixing Protocol
- (31) VLOG Incident Sheet Feed Manufacturing and Logistics
- (32) VLOG Incident Sheet Matrix Organiser
- (33) VLOG Incident Sheet Agriculture and Animal Trade
- (34) VLOG Incident Sheet Agricultural Group Organisation
- (35) VLOG Incident Sheet Food Processing/Preparation, Logistics and Retail

#### GMO-Free Certificate According to the VLOG "Ohne Gentechnik" Production and Certification Standard/EGGenTDurchfG Food Ingredients, Processing Aids and Other Substances

#### **Producer/Supplier**

Name:	Phone/Fax:
Street address:	Email:
City and postal code:	Country:

#### For the following product and all its ingredients:

Product number supplier:	
Customer's product number:	
Exact product name:	
Status/version of the valid product specification*:	
Ingredients:	Last living organism(s)**

\* This certificate shall be deemed to form part of the specifications referred to above. The specification mentioned is available for the customer.

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

	GMO-Free Certificate	Version: 01.09.22
VLOG	According to the VLOG "Ohne Gentechnik" Production and	Obligatory as of:
Annex 1	Certification Standard/EGGenTDurchfG	01.01.23
	Food Ingredients, Processing Aids and Other Substances	01.01.25

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

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

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

Date

Name, Position

Place

Signature

Company stamp

#### Glossary

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

Supplier

Name:	Phone/Fax:
Street address:	Email:
City and postal code:	Country:

#### We hereby confirm "Ohne Gentechnik" compliant feeding for the following animals/animal groups1:

Ear tag number/stamp/other information uniquely identifying the animal/animal groups	"Ohne Gentechnik" compliant feeding since <sup>2</sup> :

For other animals see attachment<sup>3</sup>:

We have suitable proof that the requirements for "Ohne Gentechnik" compliant feeding were met for all the aforementioned animals/animal groups. We agree to promptly send our customers/buyers and their certification body or licensing body a change notice or correction notice if this declaration is revoked or modified or if facts become known that raise doubts regarding the accuracy of this certificate.

We hereby authorise the Verband Lebensmittel ohne Gentechnik (VLOG), to verify the accuracy of this confirmation in on-site inspections within the scope of random sampling or in suspicious cases and to take samples for testing. These inspections may be carried out by third parties on behalf of VLOG.

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

Name, Position

Place

Date

Signature

Company stamp

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

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

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

#### I. Business ID and animal information

Fax:

Balis	:///	VO	No.:
Dunis			

Name:

Street:

City and postal code:

**Delivery date:** 

Phone:

Type of animal/species	Ear tag	Date of birth	"Ohne Gentechnik" conversion date	VLOG- compliant*	
				Yes	No
				Yes	No
				Yes	No
				Yes	No
				Yes	No
	Type of animal/species	Type of animal/species Ear tag	Type of animal/species       Ear tag       Date of birth         Image: Constraint of the symptotic symptot symptot symptotic symptotic symptotic symptot symptot	Type of animal/species Far tag Date of hirth	Type of animal/species     Ear tag     Date of birth     conversion date     compliant       Image: Species     Image: Species     Yes       Image: Species     Image: Species     Yes

#### Total number of animals to be slaughtered:

\* To be classified as 'VLOG-compliant' every animal must meet the requirements for "Ohne-Gentechnik" feeding for a prescribed time interval before slaughtering. This period is four months for pigs and twelve months for cattle, or, in any case, at least three-fourths of an animal's life. The following formula can be used to make the calculation for cattle:

Number of days of Ohne Gentechnik feeding (conversion date to delivery date)Total number of days (date of birth until delivery date)

#### Regulation on the Hygiene Requirements for the Manufacture, Treatment and Marketing of Certain Foodstuffs of Animal Origin (Animal Foodstuffs Hygiene Regulation - Tier-LMHV)

Annex 7 (to Sec. 10 para. 2) information on food safety in accordance with Appendix II Section III No. 1 in conjunction with Nos. 3 and 4 lit. b sentence 2 of Regulation (EC) No. 853/2004 for animals that were taken to or will be taken to a slaughterhouse. **II. Standard Declaration** 

#### The food business operator who is responsible for the holding of origin for the aforementioned animals declares the following:

1. There is no relevant information on the animal health status at the holding of origin, the health status of the animals and on production data, which may indicate the presence of a disease. The holding of origin is not aware of any relevant information regarding previous ante-mortem and post-mortem inspections of the slaughtered animals.

1a. Officially approved use of controlled livestock conditions in pig-farming facilities Yes No

- 2. There are no signs of disease that could affect the safety of the meat.
- 3. For seven days before the animals were brought for slaughter and during the entire fattening period for broiler chickens there were

no waiting times for veterinary medicinal products administered

waiting times for the following veterinary medicinal products

No other treatments were performed, except for (e.g. repellents).

- 4. There are no sample test results that are of relevance to the protection of public health, except for:
- 5. Name and address of regular veterinarian:

Company (designation, company stamp, if applicable): Send test results to (email): Identification number (if applicable): Sampling location, add sketch (if applicable): Name of the sampler: Type of sample: Seed Feed Raw material Product VLOG certification: Yes No Type/description: Manufacturer production date (if known): Lot number or internal number: Best-before date (if available):

\* For feed samples from on-farm mixers of feed the **mixing protocol** with the **ingredients** and the mixing

date must be enclosed or specified. For purchased feed, seeds and raw materials attach the label, waybills and i.a. the specification.

#### Sample identification (specific numbers):

Composition\*, add attachments (if applicable):

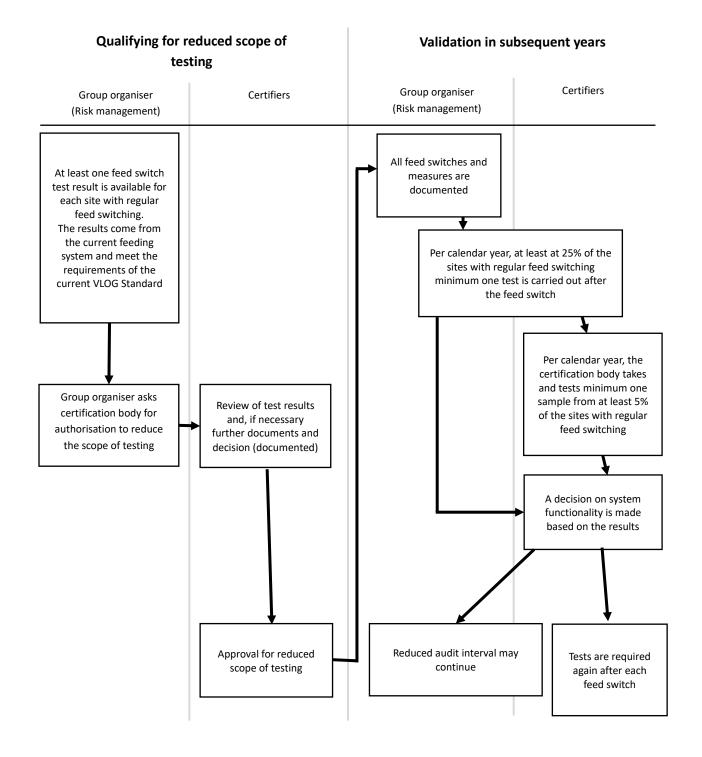
The containers shall be labelled with the sample ID, the sampling date and the facility number!

#### Sample container # 1:

Sample container # 2:

Sample container # 3 (remains in the company):

Process diagram for reducing the scope of testing in group certification at the agricultural stage. This flow chart only provides an overview of the certification process. Details can be found in Chapter F 2.6.7



#### CERTIFICATE

The certification body
Sample Certification Body GmbH

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

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

### Sample Company GmbH & CO. KG

Official Registration No. (if available): ##### VLOG ID: 10-##### Sample Street 1, 10101 Sample City Germany

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

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

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

meet the requirements of the VLOG "Ohne Gentechnik" Production and Certification Standard (Version 25.01, 01.09.2024), based on Sections 3a and 3b of the German EC Genetic Engineering Implementation Act (EGGenTDurchfG).

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



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

Report No. (if applicable): ###### Certification No.: ##### Date of certification decision: ##.##.#### Certification valid until: ##.##.#####

Place, Date Name/Certifier's Signature

Sub-stage		Areas of Applicability	
Logistics			
Transport	🗆 Feed (bulk)	Food (bulk)	
Storage	🗆 Feed (bulk)	Food (bulk)	
Handling	🗆 Feed (bulk)	Food (bulk)	
Drop shipping	🗆 Feed (bulk)	Including conversion of feed material to	Food (bulk)
	Feed (packaged)	"VLOG geprüft"	🗆 Food (packaged)
Trade	🗆 Feed (bulk)	Including conversion of feed material to	Food (bulk)
	Feed (packaged)	"VLOG geprüft"	Food (packaged)
Private Labelling	Feed (bulk)	Feed (packaged)	
Feed Manufacturing			
Feed manufacturing/	Feed material	Compound feed	Lick blocks
processing	Premixed Feed	Feed additives	
□ Mobile grinding and m	hixing facility		
Matrix Organisation			
Transport	🗆 Feed (bulk)	Food (bulk)	
Storage	🗆 Feed (bulk)	Food (bulk)	
Handling	🗆 Feed (bulk)	Food (bulk)	
Drop shipping	🗆 Feed (bulk)	Including conversion of feed material to	Food (bulk)
	🗆 Feed (packaged)	"VLOG geprüft"	🗆 Food (packaged)
Trade	🗆 Feed (bulk)	Including conversion of feed material to	🗆 Food (bulk)
	Feed (packaged)	"VLOG geprüft"	🗆 Food (packaged)
Private labelling	🗆 Feed (bulk)	Feed (packaged)	
Feed manufacturing/	Feed material	Compound feed	Lick blocks
processing	Premixed Feed	Feed additives	
□ Mobile grinding and m	nixing facilities		

Sub-stage	Areas of Applicability					
Agriculture						
🗆 Animal transport, liv	Animal transport, livestock trade					
Agriculture, Group O	rganisation Agriculture					
Animal production	<ul> <li>Cattle - cow's milk (raw)</li> <li>Cattle - dairy cows &amp; offspring<sup>1</sup></li> <li>(meat/animals)</li> <li>Cattle - suckler cows &amp; offspring<sup>1</sup></li> <li>Cattle - fat stock</li> <li>Cattle - breeding bull</li> <li>Pig - breeding piglets/sow keeping</li> <li>Pig - fattening pigs</li> <li>Pig - breeding animals</li> <li>Poultry - laying hens (meat/animals)</li> <li>Poultry - eggs</li> </ul>	<ul> <li>Poultry - day-old chicks (stating the type turkey/chicken)</li> <li>Sheep - meat/animals</li> <li>Sheep - sheep's milk (raw)</li> <li>Goats - meat/animals</li> <li>Goats - goat's milk (raw)</li> <li>Horses</li> <li>Rabbits</li> <li>Farmed game</li> <li>Aquaculture (stating the type)</li> <li>Apiary - honey/bees</li> <li>Camels</li> <li>Poultry - broiler chickens (stating the type - turkeys / chickens / ducks / geese)</li> <li>Poultry - pullets</li> </ul>				

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

Food Processing/Prep	aration		
N.A.	Meat and meat products	Butter milk products	Processed cheese, processed cheese
	Meat – floury (stating the animal species)	Cream and Cream products	preparation
	□ Meat – spiced/marinated (stating the animal	Whey and Whey products	Cheese preparations
	species)	Coffee cream	Milk products with fruit preparations
	□ Meat products (stating the product:	□ Unsweetened evaporated milk	Prepared milk beverages (flavoured
	firm/spreadable raw sausage, parboiled	products	milk drinks)
	sausages, parboiled sausage, spreadable	Sweetened condensed milk products	Pudding, cream dishes, desserts,
	cooked sausage, black pudding, jellied brawn,	🗆 Quark	sweet sauces
	pâté, liver sausage, cooked mettwurst, head	Quark with herbs	🗆 lce cream
	cheese, cooked/raw salted meat, corned meat)	Dry milk products (stating the product:	
	□ Slaughtering (cattle)	powdered milk, yoghurt powdered, kefir	Fish and fish products
	□ Slaughtering (pigs)	powder, skim milk powder, buttermilk	Fish products
	□ Slaughtering (poultry)	powder, whey powder)	□ Slaughtering (fish/ seafood stating the
	□ Slaughtering (rabbits)	Skim milk concentrate/whey	type)
	□ Cutting (cattle)	concentrate	□ Cutting (fish/ seafood stating the type)
	□ Cutting (pigs)	Powder mixture for dairy product	
	Cutting (poultry)	🗆 Lactose	Eggs and egg products
	□ Cutting (rabbits)	□ Milk protein	Eggs
	□ Stock, broth, bouillon (stating the animal	🗆 Milk permeate	Cooked, coloured eggs
	species)	🗆 Butter, butterfat	□ Whole egg liquid, egg yolk liquid, egg
		□ Hard cheese	white liquid
	Milk and dairy products	Semi-hard cheese/sliced cheese	□ Whole egg powder, egg yolk powder,
	Dairy (whole milk, skimmed milk)	□ Soft cheese	egg white powder
	Dairy (raw milk)	Sour milk cheese	
	Fermented milk products	Cream cheese	Cooking fats and oils, Margarine
	🗆 Plain yoghurt	□ Brine cheese	🗆 Margarine
	□ Yoghurt products	🗆 Pasta filata cheese	Cooking fat (stating the type)
	□ Kefir products		Cooking oil (stating the type)

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Annex 12

	Sugar, sweetener, honey	Fruits and vegetables	<u>Beverages</u>
	□ Sucrose (Sugar from sugar beet)	Cooled or frozen fruit (mixtures)	Beer
	□ Sucrose (Sugar from sugar cane)	□ Cooled or frozen vegetables (mixtures)	🗆 Fruit juices
	□ Liquid sugar	□ Tinned fruit	
	🗆 Invert sugar syrup	Tinned vegetables	<u>Others</u>
	🗆 Glucose, Glucose syrup	Fruit preparations	🗆 Legumes
	□ Fructose and fructose syrup	🗆 Fruit spread	🗆 Spices, blend of spices, marinades
	🗆 Honey	Stock, broth, bouillon (vegetable)	🗆 Stabiliser
			🗆 Enzyme, enzyme preparations
	Cereal products, cereals, industrial baked	<u>Vegetarian and vegan products</u>	Processing aids
	goods and pastries, confectionery, snacks	Milk substitute products	
	🗆 Pasta	Meat substitute products	Processing procedures
	Grain and Grain products	Vegetable spreads and dips	Cut/shred (stating the product)
	Cookies		□ Grate (stating the product)
	Confectionery		
Retail	1		
N.A.	Bulk meat products	□ Bulk cheese products	
	□ Bulk meat products spiced/marinated	Bulk cheese product spiced/marinated	

Other areas of applications ca be issued after consultation with VLOG

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

Name of business	
Official approval or registration number (in accordance with Regulation EC No. 183/2005)	
Address/location of the business (including country code)	
Contact person & contact	
data	
(e.g., telephone, e-mail address)	
VLOG-ID <sup>1</sup> or	
Matrix organiser	

#### **Description of activities**

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion VLOG of the total production (%)	VLOG outgoing goods (Annual tonnage)
Transport		
□ Storage		
□ Handling		
<ul> <li>Trade/Drop shipping</li> <li>incl. conversion of feed material to "VLOG geprüft"</li> </ul>		
Private Labelling		

# <u>Of</u>

 $\Box$  Feed

 $\Box$  Food

# Use of the "VLOG geprüft" and/or the "Ohne GenTechnik" seal

The "VLOG geprüft" seal and/or the "Ohne GenTechnik" seal is used on the following □ documents/media to label VLOG-certified feed and/or food. A licence agreement with VLOG is on file:

	Labels,		Delivery	slips,	Website		Other media
	declarations $\Box$	invoices		(f	(flyers, catalogues, etc.)		

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

## Other sites

- □ <u>No</u> other sites are included in the VLOG certification.
- □ The following sites are included in the VLOG certification:

Name of the business	Address	Activity/process

□ For others, see informal attachment

## **External Service Providers**

- No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- □ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

outsourceu.			
Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/ certified under a standard recognised as equivalent or included in the business' own VLOG certification)

□ For others, see informal attachment

### PART 3: SAMPLING & GMO TESTING

- □ Sampling and testing are <u>not required (multiple answers are possible)</u>:
  - □ Only storage, transport and/or transhipment
  - □ Trading: Only tamper-proof, packaged goods (e.g., feed as sacked goods, food in its final packaging, etc.).
  - □ Trading of feed: Trade and transport exclusively without (interim) storage
  - Drop shipping without conversion of feed to "VLOG geprüft"
  - □ Drop shipping of food
  - □ Private Labelling of feed without taking physical possession of bulk goods
- □ <u>Requirement</u> of sampling (reference samples) and testing of feed and/or food in "Ohne Gentechnik" production. <u>The business has a written sampling and testing plan:</u>
  - □ Trading of "VLOG geprüft" feed
  - □ Trading or Drop shipping with conversion of feed to "VLOG geprüft" quality
  - □ Private labelling of feed with taking physical possession of bulk goods
  - □ Trading of VLOG food

## PART 4: DOCUMENTS TO BE PREPARED

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

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

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

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

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

## VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage B\_Logistics

Business:	
Identification number if available:	
VLOG-ID (10-xxxxx) or Matrix organiser:	
Audit participant business:	
Sites that have been audited incl. Adress and VLOG-Sub-ID (10-xxxxx-A/B/etc.):	
Scope of certification:	

Date of audit:			
Duration of audit (time from - to):			
Auditor:			
Responsible certification body:			
Combination with other standard(s):			
Focus of facility inspection:			
Sampling during audit:	🗆 Yes	□ No	
Is the "VLOG geprüft" seal or "Ohne	=		Ohne VLOG geprüft
GenTechnik" seal used?	🗆 Yes	□ No	Genrechnik

Grading							
Number of A-gradings	0						
Number of B-gradings	0						
Number of C-gradings	0						
Number of N.Agradings	0						
Number of KO-gradings	0						
Total points	0						
Maximum achievable number of points	300						
Number of evaluated criteria	0						

Auditor's signature:

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

Business's signature:

V25.01

		Gra	ading (j	olease se	lect with	ו" x ")		Corrective actions		
No. in Standard	Topic in Standard	A	В	С	N.A.		Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10	pts 5 p	ts -10 pts	N.A.	not passed				
B 2	General requirements for the stage logis	stics								
B 2.1	Standard Usage Agreement with VLOG									
В 2.2	Facility Description									
В 2.3	Assignment of Responsibilities, Organisational Chart									
В 2.4	Risk Management	ко								
В 2.5	Commissioning External Service Providers									
B 2.6	Segregation of Goods Flows/Exclusion I of Contamination	ко								

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

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

No. in Standard	Topic in Standard		A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
В 4	Specific Requirements for Trade	are	graded		If the	e sub-st		iness, all points vant, KO criteria		
B 4.1	Incoming Goods Inspection	ко								
B 4.2	Sampling and Testing						•	•		
B 4.2.1	Sampling and Testing Plan									
В 4.2.2	Sampling and Commissioning a Laboratory									
B 4.2.3	Frequency of Sampling and Testing									
B 4.2.4	Evaluation of Test Results									

No. in Standard	Topic in Standard					N.A.		Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
B 5	Specific Requirements for Drop Shipping	are	graded	as N.A		sub-st		iness, all points vant, KO criteria	_	
B 5.1	Incoming Goods Inspection	ко								
B 6	Specific Requirements for Conversion of Feed to "VLOG geprüft"	are	graded	as N.A		sub-st		iness, all points vant, KO criteria		
B 6.1	Specific Requirements for Risk Management									
B 6.2	Incoming Goods Inspection									
В 6.3	Sampling and Testing for Conversion									

No. in Standard	Topic in Standard	1	A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		1	10 pts	5 pts	-10 pts	N.A.	not passed			
B 7	Labelling of Feed	are g	raded	tage is as N.A	not rel	evant sub-st	for the bus	iness, all points vant, KO criteria		
B 7.1	Certification Status of Contract Manufacturers	ко								
В 7.2	Contractual Agreement between Private Labeller and Contract Manufacturer	ко								
В 7.3	Incoming Goods Inspection									
B 7.4	Sampling and Testing									

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

Name of business	
Official approval or registration number (in accordance with Regulation EC No. 183/2005)	
Address/location of the business (including country code)	
Contact person & contact	
data	
(e.g., telephone, e-mail address)	
VLOG ID <sup>1</sup> or	
Matrix organiser	

#### **Description of activities**

as of application of VLOG certification nnex 12 of the VLOG Standard)	Portion VLOG of the total production (%)	VLOG outgoing goods (Annual tonnage)
Feed material		
Compound feed		
Lick blocks		
Feed additives		
Premixed feed		

□ The business performs activities in the VLOG stage of Logistics (transport, handling, storage, trading, drop shipping, private labelling of feed) that are subject to certification. The VLOG facility description for the stage of Logistics (VLOG Standard Annex 13) is attached.

Facility description: Logistics

# Use of the "VLOG geprüft" seal

- The "VLOG geprüft" seal is used on the following documents/media to label VLOG-certified feed. A licence agreement with VLOG is on file:
  - Labels,Delivery slips,Other media (flyers, catalogues,declarationsinvoicesetc.)

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

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

### Other sites

- □ No other sites are included in the "VLOG geprüft" production.
- □ The following sites are included in the "VLOG geprüft" production and certification:

Name of the business	Address	Activity/process

□ For others, see informal attachment

### **External Service Providers**

- No activities and processes subject to certification under the VLOG Standard have been awarded
- $\neg$  or outsourced to third parties (subcontractors/contract processors).
- □ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

outsourceu.			
Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/ certified under a standard recognised as equivalent or included in the business' own VLOG certification)

□ For others, see informal attachment

### Feed subject to compulsory labelling in the business/at the site

- Feed, technical processing aids, or other production means subject to compulsory labelling are not present in the business/at the site.
  - □ The business/site has converted fully to "VLOG geprüft" production.
  - □ The business/site processes or prepares feed not subject to compulsory labelling in addition to "VLOG geprüft" feed.
- □ Feed, technical processing aids, or other production means subject to compulsory labelling are present in the business/at the site.

The separation between "VLOG geprüft" production and GMO production is organised as follows:

□ Temporal □ Spatial segregation

### PART 3: SAMPLING & GMO TESTING

GMO testing is necessary to protect "VLOG geprüft" production. The business has a written sampling and testing plan.

- □ Risk-prone feed at goods receiving
- GMO monitoring of outgoing goods

## PART 4: DOCUMENTS TO BE PREPARED

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

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

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

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

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

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

Name of business	
Official approval or registration number	
(in accordance with	
Regulation EC No.	
183/2005)	
Address/location of the	
business (including	
country code)	
Contact person & contact	
data (e.g., telephone,	
e-mail address)	
VLOG ID <sup>1</sup> or matrix	
organiser	

## **Description of Logistics**

	eas of application of VLOG certification Annex 12 of the VLOG Standard)	Portion VLOG of the total production (%)	VLOG outgoing goods (Annual tonnage)
Fe	ed Manufacturing		
	Feed material		
	Compound feed		
	Lick blocks		
	Feed additives		
	Premixed feed		
Lo	gistics		
	Transport		
	□ Storage		
	□ Handling		
	<ul> <li>Trade/Drop shipping</li> <li>incl. conversion of feed material to "VLOG geprüft"</li> </ul>		
	Private Labelling		

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

### Use of the "VLOG geprüft" seal

- The "VLOG geprüft" seal is used on the following documents/media to label VLOG-certified feed. A licence agreement with VLOG is on file:
  - Labels, Delivery slips, Website Cher media (flyers, catalogues, etc.)

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

#### Other sites

- □ No other sites are included in the "VLOG geprüft" production.
- □ The following sites are included in the "VLOG geprüft" production and certification:

Name of the business	Address	Activity/process

□ For others, see informal attachment

#### **External Service Providers**

- No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- □ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/ certified under a standard recognised as equivalent or included in the business' own VLOG certification)

□ For others, see informal attachment

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

### Feed subject to compulsory labelling in the business/at the site

- Feed, technical processing aids, or other production means subject to compulsory labelling are not present in the business/at the site.
  - □ The business/site has converted fully to "VLOG geprüft" production.
  - □ The business/site processes or prepares feed not subject to compulsory labelling in addition to "VLOG geprüft" feed.
- Feed, technical processing aids, or other production means subject to compulsory labelling are present in the business/at the site.
   The separation between "VLOG geprüft" production and GMO production is organised as follows:
  - □ Temporal □ Spatial segregation

### PART 3: SAMPLING & GMO TESTING

#### Feed manuacturing:

GMO testing is necessary to protect "VLOG geprüft" production. <u>The business has a written sampling</u> and testing plan.

- □ Risk-prone feed at goods receiving
- □ GMO monitoring of outgoing goods

#### Logistics:

- □ Sampling and testing are <u>not required (multiple answers are possible)</u>:
  - □ Only storage, transport and/or transhipment
  - □ Trading: Only tamper-proof, packaged goods (e.g., feed as sacked goods).
  - □ Trading of feed: Trade and transport exclusively without (interim) storage
  - □ Trading of feed: Only VLOG-certified or certified under another standard recognised as equivalent.
  - Drop shipping without conversion of feed to "VLOG geprüft"
  - □ Drop shipping of food
  - □ Private Labelling of feed without taking physical possession of bulk goods
- □ <u>Requirement</u> of sampling (reference samples) and testing of feed in "Ohne Gentechnik" production. <u>The business has a written sampling and testing plan:</u>
  - □ Trading of "VLOG geprüft" feed
  - □ Trading or Drop shipping with conversion of feed to "VLOG geprüft" quality
  - □ Private labelling of feed with taking physical possession of bulk goods
  - □ Trading of food

## PART 4: DOCUMENTS TO BE PREPARED

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

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

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

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

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

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

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

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

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

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

Auditor's signature:

Business's signature:

V25.01

		Gradi	ng (plea	se sele	t with	"x")		Corrective actions		
No. in Standard	Topic in Standard	Α		С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10 pts		-10 pts	N.A.	not passed				
C 2	General Requirements for the stage Feed N	/lanufacti	uring							
C 2.1	Standard Usage Agreement with VLOG									
C 2.2	Facility Description									
C 2.3	Assignment of Responsibilities, Organisational Chart									
C 2.4	Risk Management K	0								
C 2.5	Commissioning External Service Providers									

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

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

No. in Standard	Topic in Standard	A	В	C	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)				
		10 pts	5 5 pts	-10 pts	N.A.	not passed							
C 3	Manufacturing/Processing and m	this sub-stage is not relevant for the business, all points re graded as N.A If the sub-stage is relevant, KO criteria nay not be graded as N.A.											
C 3.1	Sampling and Testing												
C 3.1.1	Sampling and Testing Plan												
C 3.1.2	Sampling and Commissioning a Laboratory												
C 3.1.3	Frequency of Sampling and Testing												
C 3.1.4	Evaluation of Test Results												
C 3.2	Reference Samples												
C 3.3	Outgoing Goods Control, Labelling on Bills of Lading												

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

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

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

Date of audit:			
Duration of audit (time from - to):			
Auditor:			
Responsible certification body:			
Combination with other standard(s):			
Focus of facility inspection:			
Sampling during audit:	□ yes	□ no	
ls the "VLOG geprüft" seal or "Ohne GenTechnik" seal used?	□ yes	□ no	Ohne Genrichsik VLOG gepruft

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	410
Number of evaluated criteria	0

Auditor's signature:

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

Business's signature:

V25.01

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

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

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

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

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

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
В 3	Specific Requirements for Storage and Handling	are g	raded		. If the	sub-sta		ness, all points ant, KO criteria		
B 3.1	Incoming Goods Inspection	ко								
В 4	Specific Requirements for Trade	are g	raded		. If the	sub-sta		ness, all points ant, KO criteria		
B 4.1	Incoming Goods Inspection	ко								
B 4.2	Sampling and Testing						<b>I</b>			
B 4.2.1	Sampling and Testing Plan									
В 4.2.2	Sampling and Commissioning a Laboratory									

No. in Standard	Topic in Standard	A	ľ	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10	) pts !		-10 pts	N.A.	not passed			
B 4.2.3	Frequency of Sampling and Testing									
B 4.2.4	Evaluation of Test Results									
B 5								ness, all points		
							ige is releva	nt, KO criteria		
B 5.1		<mark>may no</mark> KO	ot be g	graded	as N.A					
B 6	Specific Requirements for Conversion of									
							ige is releva	nt, KO criteria		
		may no	ot be g	graded	as N.A	<b>.</b>			1	
B 6.1	Specific Requirements for Risk Management									
В 6.2	Incoming Goods Inspection									

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
В 6.3	Sampling and Testing for Conversion									
В 7	Specific Requirements for Private Labelling of Feed	are	graded		. If the	sub-sta		ness, all points nt, KO criteria		
В 7.1	Certification Status of Contract Manufacturers	ко								
В 7.2	Contractual Agreement between Private Labeller and Contract Manufacturer	ко								
В 7.3	Incoming Goods Inspection									
В 7.4	Sampling and Testing									

### PART 1: BUSINESS PARAMETERS

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

Name of business	
Address of the business (including country code)	
Official registration	
number, if applicable	
(in accordance with Regulation EC No. 183/2005)	
,	
Contact person & contact	
data	
(e.g., telephone, e-mail address)	
VLOG ID <sup>1</sup> or	
Matrix organiser	

# Description of activities

Activity area in the VLOG production	Portion VLOG of the total production (%)	Annual tonnage VLOG		
Mobile grinding and/or mixing facility				
Trading of oils and fats				
<ul> <li>Oils and fats of "VLOG geprüft" quality</li> <li>Oils and fats not subject to compulsory labelling</li> <li>Oils and fats subject to compulsory labelling</li> </ul>				

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

# PART 2: ORGANISATION OF VLOG MIXTURES

# Mobile grinding and/or mixing facilities involved in VLOG production

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

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

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

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

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

# Matrix description of "SaMa GmbH" sample matrix

# Matrix organiser:

SaMa GmbH

Sample street 12, 54321 Sample town

# Responsible for matrix certification:

Sam Sample (QM Officer of Sample GmbH)

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

# Activities of matrix members:

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

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

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

# Contractors, subcontractors and outsourced processes:

The following contractors are included in the SaMa matrix:

• Feedmill GmbH, Feedstreet 8, 12345 Sampleville

Contact person: Contact information:

On behalf of SaMa GmbH [...]

• [...]

# Responsibilities of the matrix organiser:

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

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

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

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

# [...]

# Basis for the initial and subsequent certifications

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

Or:

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

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

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

VLOG Standard Annex 18	Template for Matrix Description including Site List	Version: 01.09.2024	

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

# Site list of SaMa GmbH

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

# VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage D\_Matrixorganisation

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

Date of audit:	
Duration of audit (time from - to):	
Auditor:	
Responsible certification body:	
Combination with other standard(s):	
Focus of facility inspection:	
Is the "VLOG geprüft" seal used?	🗆 yes 🗆 no

Grading					
Number of A-gradings	0				
Number of B-gradings	0				
Number of C-gradings	0				
Number of N.Agradings	0				
Number of KO-gradings	0				
Total points	0				
Maximum achievable number of points	200				
Number of evaluated criteria	0				

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

Auditor's signature:

Business's signature:

V25.01

	Gradi	Grading (please select with " x ")					Correc	Corrective actions	
Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
	10 pt:	5 pts		N.A.	not passed				
Requirements for Matrix Organisers									
Standard Usage Agreement with VLOG									
Matrix Description									
Site list									
Facility description of sites									
Contractual Binding of the Members	ко								
Risk Management I	ко								
	Requirements for Matrix Organisers         Standard Usage Agreement with VLOG         Matrix Description         Site list         Facility description of sites         Contractual Binding of the Members	Topic in Standard       A         Image: Contractual Binding of the Members       10 pts         Requirements for Matrix Organisers       Image: Contractual Binding of the Members       10 pts         Requirements for Matrix Organisers       Image: Contractual Binding of the Members       Image: Contractual Binding of the Members       Ko	Topic in Standard       A       B         Image: Imag	Topic in StandardABC10 pts5 pts10 ptsRequirements for Matrix OrganisersStandard Usage Agreement with VLOGIIIMatrix DescriptionIIIISite listIIIIFacility description of sitesIIIIContractual Binding of the MembersKOIII	Topic in StandardABCN.A.Image: Image:	Image: space of the space of	Topic in Standard       A       A       B       C       N.A.       KO       Evaluation/Explanation         Image: Agreement with VLOG       10 pts       10 pts	Topic in Standard       A       A       B       C       NA       GO       Fullation/Explanation       Corrective action (business)         Image: Standard Usage Agreement with VLOG       Image: Stan	

No. in Standard	Topic in Standard	A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts	N.A.	not passed			
D 2.5	Commissioning External Service Providers								
D 2.6	Sampling and Testing								
D 2.6.1	Sampling and Testing Plan								
D 2.6.2	Sampling and Commissioning a laboratory								
D 2.6.3	Frequency of Sampling and Testing								
D 2.6.4	Evaluation of Test Results								
D 2.6.5	Evaluation of the analytical data								

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 p	ts 5 pts	-10 pts	N.A.	not passed			
D 2.7	Staff and Member Training								
D 2.8	Handling of Non-Compliant Feed, Raw KO Materials and Products	,							
D 2.9	Complaint Management								
D 2.10	Goods Recall								
D 2.11	Crisis Management KO	)							
D 2.12	Corrective Action, Ongoing Improvement Process								

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Responsibility/ dates/status (business)
		10 pts		-10 pts	N.A.	not passed		
D 2.13	Documentation and Retention Periods							
D 2.14	Internal Audit							

### PART 1: BUSINESS PARAMETERS

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

Name of business		
Facility number/VVVO no.		
Address of the business/site (including country code)		
Contact person & contact data (e.g., telephone, e-mail address)		
	□ Individual VLOG certification	□ Group member
Type of VLOG certification/ VLOG-ID	VLOG-ID:	VLOG group member-ID (Ask your group organiser)

#### Organizational chart

There is an updated organisational chart for the agricultural business.

For small facilities (according to the VLOG Standard):

□ The following employees are involved in "Ohne Gentechnik" production:

Employees (Family members/external employees)	Function, responsibility	Substitution

## **Description of activities**

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion VLOG of the total production (%)	Volume produced annually VLOG (kg, t or units)	Starting date for "Ohne Gentechnik" feeding

□ For others, see informal attachment

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

#### Stable space overview and animal inventory overview

- A current "VLOG stable space overview" is enclosed as an attachment.
- The business has a current animal inventory overview.

#### Purchase of animals for "Ohne Gentechnik" production

- No animals have been purchased since the last VLOG audit.
- Animals have been purchased since the last VLOG audit.
  - Attachment: "Ohne Gentechnik"-compliant feeding by the previous owner is being credited: The attachment "Purchase and outsourcing of animals" is enclosed
  - □ The minimum feeding conversion period was begun after the purchase of the animal for the business or "Ohne Gentechnik"-compliant feeding by the previous owner is not being credited.
  - Poultry for meat production: One-day chicks were purchased since the last VLOG audit.1

#### Outsourcing of animals in "Ohne Gentechnik" production

- No animals have been outsourced since the last VLOG audit or animals have been outsourced, but the minimum feeding conversion period doesn't start until after return to the own business
- Animals have been outsourced since the last VLOG audit (e.g., cattle: young cattle, gestating cows): The attachment "Purchase and outsourcing of animals" is enclosed.

Attachment: Receipt and outsourcing of animals

### **PART 3: RATIONS & FEED**

#### **Own feed production**

- The business does not produce plant-based feed.
- The business itself produces plant-based feed. There is evidence that GMO cultivation is not П permitted in the country of cultivation.

None of the receipts for, or labels on, seeds or seedlings used in feed production indicate the presence of GMO in the seeds or seedlings.

- Staple/green feed Threshing crops
- Root crops Other:
- There is GMO cultivation in the country of cultivation (e.g., Spain, Portugal). The business itself produces plant-based feed. The attachment "GMO cultivation" is enclosed. Attachment:

GMO cultivation

#### **Purchase of feed**

- No feed has been purchased since the last VLOG audit
- Attachment: Feed has been purchased since the last VLOG audit: The attachment "Purchase of feed" Purchase of feed is enclosed.

Attachment: Stable space

Receipt and

outsourcing of animals

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

## **PART 4: RISK ANALYSIS & RISK MANAGEMENT**

- The entire business operates in accordance with the requirements for "Ohne Gentechnik" production, i.e.:
  - No GMO feed is produced, stored, processed or fed to animals.
  - There is no inter-business use of machinery or outsourcing of activities to external service providers when dealing with feed (except for cultivation and harvesting)<sup>2</sup>.

Currently there are no further measures the business needs to take to preclude future contamination with or carryover of GMO-containing feed.

There are risks in the business affecting "Ohne Gentechnik" production (e.g., GMOs in the Π business, inter-business use of machinery for feed after harvesting, mobile grinding and mixing facilities, other external service providers). Attachment: **Risk analysis** The attachment "Risk analysis" or, for countries with GMO cultivation, the attachment "GMO cultivation" is enclosed. Attachment: GMO cultivation

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

Potentially risk-prone feed is only used in "Ohne Gentechnik" production if it is of "VLOG geprüft" quality or a quality recognised as equivalent. Sampling and testing are not necessary under the VLOG Standard.

(If the item applies, continue to Part 6)

- Only for VLOG group members: The agricultural business samples the risk-prone feed and retains any reference samples. The group organiser organises and commissions the GMO testing of the feed or the reference samples. (If the item applies, continue to Part 6)
- According to the VLOG Standard, the business must take samples (reference samples) and test the feed used in "Ohne Gentechnik" production for GMOs because:
  - Risk-prone feed is being used and/or
  - There is a regular switch between "Ohne Gentechnik" feeding and GMO-feeding in a VLOG operating unit and/or
  - The business uses a non-VLOG-certified mobile grinding and mixing facility.

The business has a written sampling and testing plan.

<sup>&</sup>lt;sup>2</sup> For example: Transport, drying, storage/relocation, crushing/grinding, mixing

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

Attachments also applicable to the facility description:

- □ <sup>(</sup>) Attachment Stable space overview (mandatory attachment)

- □ 🛛 Attachment Risk analysis
- □ 🛛 🖉 Attachment GMO cultivation

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

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

VLOG Standard Annex 20a	VLOG Facility Description Agriculture Attachment Stable space overview	<b>Version:</b> 01.09.24
Name of business	VLOG-ID or VLOG group member-ID	

Please indicate ALL livestock raised in your agricultural operation.

		Production/feeding		Stable spaces	Unique stable		
Animal species/animal category (Select an item)	VLOG/ recognised as equivalent	Conventional - not subject to compulsory labelling	Conventional - subject to compulsory labelling	For poultry for fattening: production volume (kg/year)	designation, site/VVVO No./ print number, if any	<b>Remarks</b> (indicate GMO feed, other)	
Other:							

# VLOG Facility Description Agriculture Attachment Receipt and outsourcing of animals

### Name of business

VLOG-ID or VLOG group member-ID

# **RECEIPT OF ANIMALS FOR THE OHNE GENTECHNIK PRODUCTION**

Animal category (Select an item)	Number of incoming animals since last VLOG audit	Previous owner (business + address)	Previous owner VLOG- certified/certified under equivalent standard

The following requirements apply if the animals were not purchased from a VLOG-certified business or a business recognised as certified under an equivalent standard (cf. chapter E 4.8):

# Cattle

- □ "Ohne Gentechnik" feeding by the previous owner can be credited toward the minimum feeding conversion period only under the following conditions:
  - Proof according to the VLOG Standard Annex (2)

## Pigs

- □ The piglets come from a VLOG-registered or VLOG-certified piglet producer. "Ohne Gentechnik" feeding by the previous owner can be credited toward the minimum feeding conversion period under the following conditions:
  - Proof according to the VLOG Standard Annex (2)
  - Proof according to the registration certificate

## Other species of animals (except for pullets and poultry for fattening)

Animal species: \_

- □ The animals purchased were verifiably fed with feed suitable for "Ohne Gentechnik" production since birth. "Ohne Gentechnik" feeding by the previous owner can be credited toward the minimum feeding conversion period under the following conditions:
  - Proof according to the VLOG Standard Annex (2)

## **OUTSOURCING OF ANIMALS IN OHNE GENTECHNIK PRODUCTION**

Animals have been outsourced since the last VLOG audit (e.g., cattle: young cattle, gestating cows). Feeding has been "Ohne Gentechnik"-compliant:

Animal category (Select an item)	Number of animals outsourced per calendar year	Business (name + address)	Outsourcing facility VLOG-certified/certified under equivalent standard

VLOG Standard Annex 20a		VLOG Facility Description Agriculture Attachment Purchase of Feed				<b>Version:</b> 01.09.24			
Name of business				VLOG-ID or	r VLOG grou	up membe	r-ID		
			according	<b>Certification status or grade</b> of feed according to VLOG Standard E 4.2 (Please place an x next to only one feed)					,
<b>Exact description</b> of purchased feed/ commercial name	<b>Type of feed</b> (Select an item)	<b>Supplier</b> (business & address)	VLOG/ recognised as equivalent	Not subject to compulsory labelling & not risk- prone	Not subject to compulsory labelling & risk- prone	Subject to compulsory labelling/GMO	<b>Categori</b> d fed with t (Select an ite		Date of change (for additions/ deletions)
							Other:		

Т

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

### **RISK ANALYSIS & RISK MANAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS**

For businesses in EU countries in which GMO cultivation is not permitted, and no GMOs are released.

#### **Risk analysis for feed handling**

The following risks for "Ohne Gentechnik" production were identified in the business:

- □ (Temporary) production, storage, processing or feeding of GMO feed Explanation: (category of animal, GMO feed, extent, duration):
- Regular switching between feeding with "Ohne Gentechnik" feed and with GMO feed
   Explanation: (category of animal, GMO feed, extent, date of changeover):
- Utilisation of dual-use stationary grinding and mixing facilities
   Explanation: (category of animal, GMO feed, frequency of use):
- Cross-business use of machinery or use of external service providers when handling feed (see page. 3)

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

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

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

# Risk analysis external service providers

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

			Certificati service pro	on statu		
Type of service	Explanation	<b>Business</b> (name + address)	VLOG-certified/ certified under equivalent standard	QS-certified	Other/no certification	<b>Measures</b> established to avoid contamination and carryover, if any
Mobile grinding/mixing facility						
Joint use of machinery - machinery ring						
Joint use of machinery /equipment – neighbourhood assistance						
Others:						

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

### RISK ANALYSIS & RISK MANAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS

For businesses in EU countries in which GMO cultivation or the release of GMOs for research purposes is permitted or known.

The following risks for "Ohne Gentechnik" production were identified in the business:

### Risk analysis own feed production

All seeds and planting materials for one's own "Ohne Gentechnik" feed production are verifiably not subject to mandatory labelling (proof by way of declarations on seed or planting material receipts, labels).

□ Staple/green feed □ Threshing crops

- □ Root crops □ Other:\_\_\_\_\_
- According to the official location register or other information, <u>no</u> GMO plants are cultivated or released within a radius of 10 km of one's own business premises.
- □ According to the official location register or other information, GMO plants are cultivated or released within a radius of 10 km of one's own business premises.
- $\Box$  GMO plants are cultivated by the business itself.

GMO crops (own or third-party GMO cultivation or release)			
"Ohne Gentechnik" feed production of the same crop in the business		Yes	Nein
Shortest distance to the business's feed crop			
areas			

## Risk analysis for feed handling

- (Temporary) production, storage, processing or feeding of GMO feed
   Explanation (category of animal, GMO feed, extent, duration)
- □ Regular switching between feeding with "Ohne Gentechnik" feed and with GMO feed Explanation (category of animal, GMO feed, extent, date of changeover)
- Utilisation of dual-use stationary grinding and mixing facilities
   Explanation (category of animal, GMO feed, frequency of use)
- Cross-business use of machinery or use of external service providers when handling feed (see page 3)

# VLOG Facility Description Agriculture Attachment GMO cultivation

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

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

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

# Risk analysis external service providers

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

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

# PART 1: BUSINESS PARAMETERS

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

Name of the business	
Registration number/VVVO No.	
Address of the business/site (including country code)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG-ID <sup>1</sup> :	

## **Organisational chart**

- There is an updated organisational chart for the agricultural business.
- □ For small facilities (according to VLOG Standard):
  - The following employees are involved in "Ohne Gentechnik" production:

Employees* (Family members/external employees)	Function, responsibility	Substitution

# **Description of activities**

Areas of application of VLOG certification	Number of managed bee colonies	Portion of the total production (%)	Volume of honey produced annually (Kg)
Beekeeping – honey/bees			

# PART 2: PURCHASE OF ANIMALS

Are bee colonies purchased in countries other than Germany?

 $\Box$  No  $\Box$  Yes, in:

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

#### PART 3: SITE OVERVIEW

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

GMO crop(s) cultivated or released:

Shortest distance to the bee sites:

#### PART 4: FEED LIST

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

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

#### PART 4: FEED

- □ NO genetically modified feed is manufactured, stored, processed or fed on the premises, even for a limited time (*continue with Part 5*).
- The following genetically modified feed is manufactured, stored, processed or fed on the premises, even for a limited time.

Exact designation of the feed	Animal species/Animal category

The following measures are taken to prevent carryover, commingling and swapping of genetically-modified feed with feed for the bees. (e.g. upon delivery, storage...):

# PART 5: PURCHASE OF HONEY & ADDITIONAL INGREDIENTS

### □ Purchase of honey since the last VLOG audit:

Designation of honey	Supplier (name + address)	Quantity of honey purchased (kg/year)	VLOG certification is available	
			🗆 Yes	🗆 No
			🗆 Yes	🗆 No
			□ Yes	🗆 No
			□ Yes	🗆 No

Purchase of other ingredients (e.g., herbs, spices) since the last VLOG audit:

Ingredient	Supplier (name + address)	Date of GMO-free certificate (Annex (1) of the VLOG Standard)

## PART 6: OTHER RISKS OR SUSPICIOUS FACTS

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

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

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

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

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

# PART 1: BUSINESS PARAMETERS

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

Name of business		
Facility number/VVVO no.		
Address of the business/site (including country code)		
Contact person & contact data (e.g., telephone, e-mail address)		
	□ Individual VLOG certification	Group member
Type of VLOG certification/ VLOG-ID	VLOG-ID:	VLOG group member-ID (Ask your group organiser)

# Organizational chart

- There is an updated organisational chart for the agricultural business.
- For small facilities (according to the VLOG Standard):
- The following employees are involved in "Ohne Gentechnik" production:

Employees	Function, responsibility	Substitution provision

# **Description of activities**

Activity area in the VLOG production	Portion VLOG of the total	Number of animals transported or traded annually
	production (%)	VLOG (kg, t or units)
□ Animal transport		
□ Livestock trade		

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

#### **Animal Transport Overview**

The current animal transport overview is enclosed as an attachment.

### List of suppliers for "Ohne Gentechnik" production

The current overview of suppliers of VLOG animals is on file. 

#### **External shippers**

- □ No external shippers are commissioned for the transport of VLOG animals.
- The following external shippers are commissioned for the transport of VLOG animals:

Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/ certified under a standard recognised as equivalent or included in the business' own VLOG certification)

For others, see informal attachment

# **PART 3: RATIONS & FEED**

#### Feed

- Transported/traded VLOG animals are not fed
- Transported/traded VLOG animals are fed
  - Feed is produced in-house and is not subject to compulsory labelling.
  - Purchase of feed since the last VLOG audit: The attachment on "Purchase of feed is enclosed.

Attachment: Purchase of feed

## **PART 4: RISK ANALYSIS & RISK MANAGEMENT**

- The entire business operates in accordance with the requirements for "Ohne Gentechnik" production, i.e.:
  - There is no GMO feed in the business. •
  - There is no feeding during transport.
  - There is no interim stabling/handling during transport of the VLOG animals from the ٠ supplier to the customer.

Currently there are no further measures the business needs to take to preclude future contamination with or carryover of GMO-containing feed.

The business has risks affecting "Ohne Gentechnik" production (e.g., GMOs in the business, interim stabling)

The attachment on "Risk analysis" is enclosed.

Attachment: **Risk Analysis** 

Attachment: Animal transport overview

> Attachment: List of suppliers

## PART 5: SAMPLING & GMO TESTING

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

# **PART 6: SELF-MONITORING & UPDATING OF THE FACILITY DESCRIPTION** Attachments also applicable to the facility description:

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

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

Name of business

VLOG-ID or VLOG group member-ID

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

	VLC	G animals	Animals of other quality			
Animal species/animal	Feeding of		Feeding of anin trade/tran		<b>Remarks</b> (interim storage/handling, indicating GMO feed, other)	
<b>category</b> (Select an item)	Transport/ carriage	animals during transport/carriage	Transport/carriage	Only feed not subject to compulsory labelling	Also feed subject to compulsory labelling	(internit storage/handling, indicating GMO feed, other)
Other:						

VLOG Standard Annex 20c	VLOG Facility Description Agriculture Attachment List of suppliers	<b>Version:</b> 01.09.24
Name of business	VLOG-ID or VLOG group member-ID	

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

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

VLOG Standard Annex 20c		VLOG Facility Description Animal Transport/Livestock Trade Attachment Purchase of Feed					<b>Version</b> 01.09.24			
Name of business				VLOG-ID or VLOG group member-ID			-ID			
<b>Exact description</b> of purchased feed/commercial name	Type of feed     Supplier       (Select an item)     (business & address)	<b>Certification status or grade</b> of feed according to VLOG Standard E 4.2 ( <i>Please insert an x next to only one feed</i> )								
		VLOG/ recognised as equivalent	Not subject to compulsory labelling & not risk-prone	Not subject to compulsory labelling & risk- prone	Subject to compulsory labelling/GMO	<b>Categories of animals</b> fed with this feed (Select an item)		Date of change (for additions/ deletions)		
							Other:			

#### Name of business

VLOG-ID/ VLOG group member-ID

#### **RISK ANALYSIS & RISK MANAGEMENT WITH RESPECT TO THE PRESENCE OF GMOS**

#### **Risk analysis for feed handling**

The following risks for "Ohne Gentechnik" production were identified in the business:

- (Temporary) presence of GMO feed
   Explanation (category of animal, GMO feed, extent, duration):
- Interim stabling/handling of VLOG animals
   Explanation (duration, feeding):
- Simultaneous transport of "VLOG" animals and animals of a different quality in a single means of transport/transport container or mixed interim stabling at a stopover. Explanation (labelling):
- Feeding of animals during transport or interim stabling
   Explanation (feed):

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

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

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

## VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage E\_Agriculture

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

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	330
Number of evaluated criteria	0

Busine

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

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

Business's signature:

		Gradi	ng (plea	se sele	ct with	" x ")		Corrective actions		
No. in Standard	Topic in Standard	A	В	C		ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10 pts	5 pts	-10 pts		not passed				
E 3	General Requirements for the Stage Agrico	ulture								
E 3.1	Standard Usage Agreement with VLOG									
E 3.2	Facility Description									
E 3.3	Assignment of Responsibilities, Organisational Chart									
E 3.4	Risk management									
E 3.5	Commissioning External Service Providers, Joint Use of Machines and Facilities									
E 3.6	Handling of Non-compliant Feed, Froducts and Animals	«O								

Topic in Standard	А	В	С	N.A.		Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
	10	ots 5 p	ts -10 pts	N.A.	not passed			
Traceability	ко							
Complaint Management								
Crisis Management	ко							
Corrective Action								
Documentation and Retention Periods								
Staff Training								
	Traceability         Traceability         Complaint Management         Crisis Management         Crisis Management         Corrective Action         Documentation and Retention Periods	KO       KO         Traceability       KO         Complaint Management       I         Crisis Management       KO         Crisis Management       KO         Corrective Action       I         Documentation and Retention Periods       I	Image: Note of the second state of	Image: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateComplaint ManagementImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateCrisis ManagementImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateCrisis ManagementImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateCrisis ManagementImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateCorrective ActionImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal stateDocumentation and Retention PeriodsImage: Normal stateImage: Normal stateImage: Normal stateImage: Normal state	Ideal     Ideal	Ideal	Image: Normal base of the sector of the s	Image: Normal base in the strength of the strengt of the strengt of the strength of the streng

No. in Standard	Topic in Standard			с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts		-10 pts		not passed			
E 3.13	Self-monitoring								
E 4	Specific Requirements for Animal Production		1	<u> </u>		I			
E 4.1	Animal Inventory								
E 4.2	Risk-prone Feed								
E 4.3	Feed Ordering								
E 4.4	Feed List								
E 4.5	Feed Rations								

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation		Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
E 4.6	Incoming Goods Inspection of Feed	КО								
E 4.7	Compliance with the Minimum Feeding Conversion Period	ко								
E 4.8	Receipt of animals	ко								
E 4.9	Segregation of Goods Flows, Exclusion of Contamination	КО								
E 4.10		are g	raded a	s N.A		ub-sta		ess, all points nt, KO criteria	I	
E 4.10.1	Continuation of System Purges									
E 4.10.2	Joint Use of Mobile Grinding and/or Mixing Facilities									

No. in Standard	Topic in Standard	Α	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pts	5 pts	-10 pts	N.A.	not passed			
E 4.10.3	Use of Stationary Grinding and Mixing Facilities								
E 4.11	ar		as N.A	If the s	ub-sta		ess, all points nt, KO criteria		1
E 4.11.1	Sampling and Testing Plan		Ī						
E 4.11.2	Sampling, Retention of Reference Samples								
E 4.11.3	Commissioning a Laboratory								
E 4.11.4	Frequency of Testing								
E 4.11.5	Evaluation of Test Results								

No. in Standard	Topic in Standard	А	В	С	N.A.	ко	Evaluation/Explanation	Responsibility/ dates/status (business)
		10 p	s 5 pts	-10 pts		not passed		
E 4.12	Outgoing Goods Inspection, Labelling on Bills of Lading							
E 5	Feed Manufacturing		l as N.A	If the s	ub-sta		ess, all points nt, KO criteria	
E 5.1		ко						
E 5.2	Segregation of Goods Flows/Exclusion of Contamination	ко						

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

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

Date of audit:			
Duration of audit (time from - to):			
Auditor:			
Responsible certification body:	-		
Combination with other standard(s):			
Focus of facility inspection:			
Sampling during audit:	🗆 yes	□ no	
Is the "Ohne GenTechnik" seal used?	🗆 yes	□ no	

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

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

Auditor's signature:

Business's signature:

V25.01

		Grad	ing (plea	ase sele	ct with	" x ")		Corre	ctive actions
No. in Standard	Topic in Standard	A	В	C	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pt	s 5 pts	-10 pts	N.A.	not passed			
E 3	General Requirements for the Stage Agricu	lture							
E 3.1	Standard Usage Agreement with VLOG								
E 3.2	Facility Description								
E 3.3	Assignment of Responsibilities, Organisational Chart								
E 3.4	Risk management								
E 3.5	Commissioning External Service Providers, Joint Use of Machines and Facilities								
E 3.6	Handling of Non-compliant Feed, K Products and Animals	0							

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts		N.A.	not			
E 3.7	Traceability	ко			pts		passed			
E 3.8	Complaint Management									
E 3.9	Crisis Management	ко								
L 3.5		ĸo								
E 3.10	Corrective Action									
E 3.11	Documentation and Retention Periods									
E 3.12	Staff Training									
E 3.13	Self-monitoring									

No. in Standard	Topic in Standard	,	A	В	с	N.A.	ко	Evaluation/Explanation		Responsibility/ dates/status (business)
Standard			10 pts		-10 pts		not passed			
E 6	Specific Requirements for Animal Transpo	ort, Liv	vestoc	c Trade						
E 6.1	Animal Transport Overview									
E 6.2	Incoming Goods Inspection of Animals	ко								
E 6.3	Segregation of Goods Flows, Exclusion of G	Contan	ninatio	ns and	Swappir	וg			L	
E 6.3.1	VLOG animals	КО								
E 6.3.2	Feeding of Animals	КО								

## Group description of sample group

#### Group organiser:

SaGro GmbH

Sample street 12, 54321 Sample town

## Responsible for group certification:

Sam Sample (QM officer of Sample GmbH)

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

## Activities of group members:

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

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

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

## Contractors, subcontractors and outsourced processes:

The following contractors are included in the SaGro group:

• Transpofix GmbH, Feedstreet 8, 12345 Sampleville

Contact person: Contact information:

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

• [...]

## Areas of responsibility of the group organiser:

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

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

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

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

## [...]

## Basis for initial and subsequent certifications

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

Or:

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

## Use of multiple certification bodies

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

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

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

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

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

## Please attach a current list of your members using the template described below.

Members list attached

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

Year of examination	202	202	202
Name			
Function			
Date			
Signature			

VLOG Standard Annex 23	VLOG Group Description in Agriculture and Members List	Version 01.09.24	

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

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

Data exchange	between the	group organ	iser and certifica	ation body					Continued in Part 2/2
VLOG – Members List Please use a separate row for each group member!									
	1	1	-	•		1			[]
Group member Business name	Country code + postal code	Site	Street + house No.	Contact person	Email	Phone	VVVO-No./ Official approval No.	Date of initial data collection by GO	[]
Hans Müller	BB 12345	Feldkirchen	Feldweg 2	Hans Müller	hmueller@anbie ter.de	0123 45675	123 04 567 089 xxxx	14.04.19	[]
Milchhof Max	BW 98765	Milchbach	Am Milchhof 1	Max Bauer	milchhof@anbiet er.de	0987 56765	987 06 543 021 xxxx	03.07.20	[]
[]									[]

## Exemplary members list (Annex 23a) - Part 2/2

Continued from Part	Data Transfer to VLOG 1x per calender year, Time period: 1st. quarter; als an Excel file (.xlsx) via E-Mail to: <u>qualitaet@ohnegentechnik.org</u>											
1/2 (see above)	Group Organise		VLOG-ID:	As of (Date):								
[]	Group member- ID*	Postal code (123xx)	Area(s) of applicability of the VLOG certification:	Risk category	Last auditdate (Initial/Routine audit)	Audit result (%)	VLOG Group Entry date	VLOG Group Exit date	VLOG Certification body			
[]	10-12345-123	123xx	Cattle – cow's milk (raw)	0	23.05.2020	100	03.06.19		Name of cert. body			
[]	10-12345-987	987xx	Cattle – cow's milk (raw)	2	Has not yet taken place	100	05.07.20		Name of cert. body			
[]												

VLOG Standard Annex 23VLOG Group Description in Agriculture and Members ListVe	<b>Version</b> 01.09.24
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## Exemplary members list for laying hens/eggs (Annex 23b) – Part 1/2

VLOG - Memi Please use a separate	bers List - <mark>L</mark>	aying hen	iser and certifica s/eggs						Continued in Part 2/2 (see below) [] []
Group member Business name	Country code + postal code	Site	Street + house No.	Contact person	Email	Phone	VVVO-No./ Official approval No.	Date of initial data collection by GO	[]
Hans Müller	BB 12345	Feldkirchen	Feldweg 2	Hans Müller	hmueller@anbie ter.de	0123 45675	123 04 567 089 xxxx	14.04.19	[]
Eierhof Max	BW 98765	Eierbach	Eierhof 1	Max Bauer	eierhof@anbiete r.de	0987 5676	987 06 543 021 xxxx	03.07.20	[]
[]									[]

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

Weiter von Teil 1/2	Data Transfer to 1x per calender		ne period: 1st. quart	ter; als ar	Excel file (.x	lsx) via E-N	Mail to: <u>qu</u>	alitaet@ol	hnegentechnik.org	l
(s. oben)	Group Organise	er – Busin	ess name:						VLOG-ID:	As of (Date):
[]	Group member- ID*	Postal code (123xx)	Area(s) of applicability of the VLOG certification:	Risk categor y	Last auditdate (Initial/Routi ne audit)	Audit result (%)	VLOG Group Entry date	VLOG Group Exit date	VLOG Certification body	Laying farm: Print number(s)
[]	10-12345-123	123xx	Poultry – eggs	0	23.05.2020	100	03.06.19		Name of cert. body	1-DE-1234567
[]	10-12345-987	987xx	Poultry – eggs	2	Has not yet taken place	100	05.07.20		Name of cert. body	2-DE-9876543
[]										

Data exchange betwe	een the group	organiser and certif	ication body														
									Data Transfer to 1x per calender ye	VLOG ear, Time	e period: 1st quarter; as	an Exc	el file (.xlsx) via	E-Mail to: (	qualitaet@o	hnegentechni	k.org
VLOG - Men									Group organiser - B	usiness r	name:					VLOG-ID:	As of (date):
Please use a separate	e row for each	group member!							GO business name plea	ise enter h	ere					VLOG-ID please enter here	Date please enter here (dd.mm.yyyy)
Group member Business name	Country code + postal code	Site	Street + house No.	Contact person	Email	Phone	VVVO-No./ Official approval No.	Date of initial data collection by GO (dd.mm.yyyy)	Group member-ID*	Postal code (123xx)	Area(s) of applicability of the VLOG certification:	Risk categor y	Last auditdate (Initial/Routine audit) (dd.mm.yyyy)	Audit result (%)	VLOG Group Entry date (dd.mm.yyyy)	VLOG Group Exit date (dd.mm.yyyy)	VLOG Certification body
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Version	01	.09	.20	124

			NS/ Eggs	Contact person	Email	Phone	VVVO-No./ Official approval No.	Date of initial data collection by GO (dd.mm.yyyy)	Group organiser - B GO business name plea Group member-ID*			Risk categor Y	Last auditdate (Initial/Routine audit)	Audit result (%)	VLOG Group Entry date (dd.mm.yyyy)	VLOG Group Exit date (dd.mm.yyyy)	VLOG-ID: VLOG-ID please enter here VLOG Certification body	As of (date): Date please enter he (dd.mm.yyyy) Laying farm: Print number(s
Group member Cou	ountry code +		Street + house No.	Contact person	Email	Phone	Official approval	data collection by GO		Postal code	Area(s) of applicability of the	categor	(Initial/Routine audit)		Entry date	Exit date	VLOG	please enter he (dd.mm.yyyy) Laying farm:
		Site	Street + house No.	Contact person	Email	Phone	Official approval	data collection by GO	Group member-ID*	code		categor	(Initial/Routine audit)		Entry date	Exit date		Laying farm:
													(dd.mm.yyyy)					
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- Transmission of Stable Spaces Poultry -

	Anonymised transmissio	n of stable	spaces/pr	oduction volu	ume		
	- for the animal categories of the a 1x per calender year, Time period: 1st quarter;	as an Excel file (	.xlsx) via E-Mai	l to: qualitaet@ohne		rg	
Business (Group Organiser):	- Please use a sep GO business name please enter here	Stable Stable spaces (Number)	ch group memb	Produc	<mark>tion volume</mark> g/Year)	-	
VLOG-ID: As of (date):	VLOG-ID please enter here Date please enter here (dd.mm.yyyy)	Laying hens	Pullet rearing	Chicken fattening (incl. Roosters)	Turkey fattening	Goose fattening	Duck fattening

Business

VLOG-ID: As of (date):

(Group Organiser):

## - Transmission of Stable Spaces Cattle/Ruminants -

A	nonymised tran	smission	of stable	e spaces									
- for the animal	l categories of the areas	of applicabil	lity of your VI	.OG group cert	ification -								
1x per calender year, Time p					:@ohnegentechnik.o	rg							
	- Please use a separat	te row for eac	ch group men	nber! -	(2)								
GO business name please enter here		Stable spaces <sup>(2)</sup> (Number)											
VLOG-ID please enter here	Dairy cows <sup>(1)</sup>	Heifers	Calves	Calf fattening	Cattle fattening (young cattle, heifers)	Bull/Oxen fattening (including young bulls)	Sheep	Goats					
Date please enter here (dd.mm.yyyy)					(young cattle, neners)	(Including young buils)							
				-									
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								1					

(1) For first reports: No. can once be calculated based on the milk yield of the business and the average yield per dairy cow.
 (2) No indication of large animal equivalents! (Pasture-fed: Indication of animal equivalents)

- Transmission of Stable Spaces Figs -

# Anonymised transmission of stable spaces/number of animals

- for the animal categories of the areas of applicability of your VLOG group certification -

1x per calender year, Time period: 1st quarter; as an Excel file (.xlsx) via E-Mail to: qualitaet@ohnegentechnik.org

- Please use a separate row for each group member! -

	- Please use a separat	te row for each grou	p member! -			
Business (Group Organiser):	GO business name please enter here		produced per year)		<b>ble spaces</b> (Number)	
VLOG-ID:	VLOG-ID please enter here	Piglet rearing	Pig fattening	Gilts	Sow keeping	Boar rearing
As of (date):	Date please enter here (dd.mm.yyyy)					

- Transmission of Test Results -

Business (Group Organiser):       GO business name please enter here         VLOG-ID:       VLOG-ID please enter here         Area of applicability of the VLOG certification          As of (date):       Date please enter here (dd.mm.yyyy)         Evaluation - Number of test results previous calendar year         GMO-Tests, performed according to VLOG Standard in previous calender year (Number):       0         If no GMO tests were performed, please enter "0")       0         Of which, permissible for VLOG production/not subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         (if > 0, please list the impermissible test results individually below)       0         Soy       Corn/Maize         (% GMO)       (% GMO)       Sampling date         (% GMO)       (% GMO)       Sampling date         (% GMO)       (% GMO)       Notes/Comments	
Area of applicability of the VLOG certification         As of (date):       Date please enter here (dd.mm.yyyy)         Evaluation - Number of test results previous calendar year         GMO-Tests, performed according to VLOG Standard in previous calender year (Number): (if no GMO tests were performed, please enter "0")       0         Of which, permissible for VLOG production/not subject to compulsory labelling (Number): (if > 0, please list the impermissible test results individually below)       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number): (if > 0, please list the impermissible test results individually below)       0         Test results (in % GMO) for feed graded as impermissible         Soy       Corn/Maize       Rapeseed/Canola       Sampling date	
As of (date):       Date please enter here (dd.mm.yyyy)         Evaluation - Number of test results previous calendar year         GMO-Tests, performed according to VLOG Standard in previous calender year (Number):       0         (if no GMO tests were performed, please enter "0")       0         Of which, permissible for VLOG production/not subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         Of which, impermissible test results individually below)       0         Test results (in % GMO) for feed graded as impermissible         Notes/Comments	
Evaluation - Number of test results previous calendar year         GMO-Tests, performed according to VLOG Standard in previous calender year (Number):       0         (if no GMO tests were performed, please enter "0")       0         Of which, permissible for VLOG production/not subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         Of which, impermissible test results individually below)       0         Test results (in % GMO) for feed graded as impermissible         Soy       Corn/Maize       Rapeseed/Canola       Sampling date	
GMO-Tests, performed according to VLOG Standard in previous calender year (Number):       0         (if no GMO tests were performed, please enter "0")       0         Of which, permissible for VLOG production/not subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         (if > 0, please list the impermissible test results individually below)       0         Test results (in % GMO) for feed graded as impermissible         Soy       Corn/Maize       Rapeseed/Canola       Sampling date	
(if no GMO tests were performed, please enter "0")       0         Of which, permissible for VLOG production/not subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         (if > 0, please list the impermissible test results individually below)       0         Test results (in % GMO) for feed graded as impermissible         Soy       Corn/Maize         Rapeseed/Canola       Sampling date       Notes/Comments	
Of which, impermissible for VLOG production/subject to compulsory labelling (Number):       0         (if > 0, please list the impermissible test results individually below)       0         Test results (in % GMO) for feed graded as impermissible         Soy       Corn/Maize         Rapeseed/Canola       Sampling date	
0         Comparison of the impermissible test results individually below)         Test results (in % GMO) for feed graded as impermissible         Soy       Corn/Maize         Notes/Comments	
Soy Corn/Maize Rapeseed/Canola Sampling date Notes/Comments	
Notes/Comments	

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

Address of the agricultural business:

## Declaration of consent for the processing of personal data in accordance with the GDPR

I consent to the transfer of the following personal data:

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

#### from (group organiser):

and the relevant certification body:

to Verband Lebensmittel Ohne Gentechnik e.V., Friedrichstraße 153 a, 10117 Berlin ("VLOG").

The group organiser

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

#### **Right of withdrawal**

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

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

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

Date of audit:	
Duration of audit (time from - to):	
Auditor:	
Responsible certification body:	
Combination with other standard(s):	
Focus of facility inspection:	
Is the "Ohne GenTechnik" seal used?	yes 🗆 no

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	230
Number of evaluated criteria	0

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

Auditor's signature:

Business's signature:

		Grad	Grading (please select with " x ")					Corrective actions		
No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)	
		10 p <sup>.</sup>	s 5 pts	-10 pts	N.A.	not passed				
F 2	Requirements for Group Organisers									
F 2.1	Standard Usage Agreement with VLOG									
F 2.2.1	Group Description									
F 2.2.2	Members list									
F 2.2.3	Stable space overview									
F 2.2.4	Facility Description of the group members									

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts		not passed			
F 2.3	Contractual Binding of the Group Members	ко								
F 2.3.1	Data Release Statement (only Laying Hens – Eggs Group Organisation)									
F 2.4	Risk Management	ко								
F 2.5	Commissioning External Service Providers									
F 2.6	Sampling and Testing									
F 2.6.1	Sampling and Testing Plan									
F 2.6.2	Sampling and Commissioning a Laboratory									

Topic in Standard	A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
	10 pt	5 pts	-10 pts	N.A.	not passed			
Frequency of Sampling and Testing								
Evaluation of Test Results								
Evaluation of the analytical data								
Disclosure of test results to VLOG								
Reduction of the Scope of Testing after Changing Feed								
Training of Staff and Group Members								
	Frequency of Sampling and Testing         Evaluation of Test Results         Evaluation of the analytical data         Disclosure of test results to VLOG         Reduction of the Scope of Testing after Changing Feed	Image: Second state of the second s	Image: space spac	Image: state in the state	Image: series of the second	Image: series of the scope of Testing after Changing Feed       Image: series of the scope of Testing after Changing Feed       Image: series of the scope of Testing after Changing Feed       Image: series of the scope of Testing after Changing Feed       Image: series of test results       Image: series of test results after Changing Feed       Image: series of test results after Field       Image: series of test results after Field       Image: series of test results after Field       Image: serie	Indext       Index       Indext       Indext	Indext       Index       Indext       Indext

No. in Standard	Topic in Standard		A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
F 2.8	Handling of Non-compliant Feed, Products and Animals	ко								
F 2.9	Complaint Management									
F 2.10	Crisis Management	ко								
F 2.11	Corrective Action, Ongoing Improvement Process									
F 2.12	Documentation and Retention Periods									
F 2.13	Internal Audits									

#### PART 1: BUSINESS PARAMETERS

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

Name of business	
Official approval or registration number (in accordance with Regulation EC No. 183/2005)	
Address of the business/site (including country code)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG ID <sup>1</sup>	

## **Description of activities**

Areas of application of VLOG certification (cf. Annex 12 of the VLOG Standard)	Portion VLOG of the total production (%)	Volume produced annually VLOG (kg, t or units)

## Use of the "Ohne GenTechnik" seal

The "Ohne GenTechnik" seal is used on the following documents/media to label VLOG-certified food. A licence agreement with VLOG is on file:

Labels,	Delivery s	slips,	Website	Other media (flyers, catalogues,
declarations	invoices		WEDSILE	etc.)

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

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

#### Other sites

- □ <u>No</u> other sites are included in "Ohne Gentechnik" certification.
- □ Other sites are included in "Ohne Gentechnik" certification.

Name of the business	Address	Activity/process

□ For others, see informal attachment

#### Production

How is the dual production of VLOG products and products that are not suitable for "Ohne Gentechnik"/"VLOG" labelling organised?

- □ Temporal separation □ Spatial s
  - Spatial separation
- n.a., business completely switched to "VLOG" production

#### **External Service Providers**

- No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- □ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/ certified under a standard recognised as equivalent or included in the business' own VLOG certification)

□ For others, see informal attachment

## PART 3: SAMPLING & GMO TESTING

- □ Sampling and testing are <u>not</u> required:
  - □ All raw materials/products used are certified under the VLOG Standard or another standard recognised as equivalent (*If the item applies, continue to Part 4*)
- □ There is a risk analysis (in writing) indicating why NO sampling or reduced sampling and GMO testing is possible. This applies, e.g., when ingredients cannot be analysed. If there is a reduction, the business must have a written sampling and testing plan. (Information sheet "Testability of raw materials")
- <u>Requirement</u> of sampling (reference samples) and testing of food in "Ohne Gentechnik" production.
   <u>The business has a written sampling and testing plan.</u>

## PART 4: DOCUMENTS TO BE PREPARED

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

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

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

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

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

## **PART 1: BUSINESS PARAMETERS**

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

Name of business	
Official approval or registration number (in accordance with Regulation EC No. 183/2005)	
Address of the business/site (including country code)	
Contact person & contact data (e.g., telephone, e-mail address)	
VLOG-ID <sup>1</sup>	

## **Description of activities**

	eas of application of VLOG certification Annex 12 of the VLOG Standard)	Portion VLOG of the total production (%)	Volume produced annually (kg, t or units)				
Fo	Food Processing/Preparation						
Lo	gistics						
	□ Transport						
	□ Storage						
	□ Handling						
	□ Trade, Drop Shipping						

## Use of the "Ohne GenTechnik" seal

- The "Ohne GenTechnik" seal is used on the following documents/media to label VLOG-certified food. A licence agreement with VLOG is on file:
  - Labels, declarations
- invoices
- Other media

(flyers, catalogues, etc.)

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

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

#### Other sites

- □ <u>No</u> other sites are included in "Ohne Gentechnik" certification.
- □ Other sites are included in "Ohne Gentechnik" certification.:

Name of the business	Address	Activity/process

□ For others, see informal attachment

#### **External Service Providers**

- No activities and processes subject to certification under the VLOG Standard have been awarded or outsourced to third parties (subcontractors/contract processors).
- □ The following activities and processes subject to certification under the VLOG Standard have been outsourced:

outsourceu.			
Activity or process	Business engaged (name, address)	Contact partner(s) and contact data	Certification status (VLOG-certified/ certified under a standard recognised as equivalent or included in the business' own VLOG certification)

□ For others, see informal attachment

#### PART 3: SAMPLING & GMO TESTING

#### Food Processing/Preparation:

- □ Sampling and testing are <u>not</u> required:
  - All raw materials/products used are certified under the VLOG (If the item applies, continue to Part 5)
- □ There is a risk analysis (in writing) indicating why NO sampling or reduced sampling and GMO testing is possible. This applies, e.g., when ingredients cannot be analysed. If there is a reduction, the business must have a written sampling and testing plan. (Information sheet "Testability of raw materials")
- <u>Requirement</u> of sampling (reference samples) and testing of food in "Ohne Gentechnik" production.
   <u>The business has a written sampling and testing plan.</u>

#### PART 3: SAMPLING & GMO TESTING

#### Logistics:

- □ Sampling and testing are <u>not required</u>:
  - □ Only storage, transport and/or transhipment
  - □ Trading: Only tamper-proof, packaged goods (e.g. food in its final packaging, etc.).
  - $\Box$  Drop shipping of food
- □ <u>Requirement</u> of sampling (reference samples) and testing of food in "Ohne Gentechnik" production. <u>The business has a written sampling and testing plan</u>:
  - □ Trading of VLOG food

#### PART 4: DOCUMENTS TO BE PREPARED

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

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

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

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

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

## VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage G\_Food Processing/Preparation

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

□ yes	□no	
🗆 🗆 yes	□ no	
	-	

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	210
Number of evaluated criteria	0

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

Auditor's signature:

Business's signature:

V25.01

		Gr	radin	g (plea	se sele	ct with	"x")		Corrective act	tions
No. in Standard	Topic in Standard	Α			С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10	) pts	5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements for the Stage Food P	rocessi	ing/P	repara	tion		•			L
G 2.1	Standard Usage Agreement with VLOG									
G 2.2	Facility Description									
G 2.3	Assignment of Responsibilities, Organisational Chart									
G 2.4	Risk Management I	ко								
G 2.5	Commissioning External Service Providers									

No. in Standard	Topic in Standard		A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
G 2	General Requirements for the Stage Food I	Proce	ssing/P	Prepara	tion					
G 2.6	Incoming Goods Inspection	ко								
G 2.7	Segregation of Goods Flows, Exclusion of Contamination	ко								
G 2.8	Handling of Non-compliant Raw Materials/Products	ко								
G 2.9	Inspection of Outgoing Goods, Labelling on Bills of Lading	ко								
G 2.10	Traceability	КО								
G 2.11	Complaint Management									

No. in Standard	Topic in Standard		A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements for the Stage Food P	roce	essing/P	repara	tion		1			
G 2.12	Goods Recall									
G 2.13	Crisis Management	КО								
G 2.14	Corrective Action, Ongoing Improvement Process									
G 2.15	Documentation and Retention Period									
G 2.16	Staff Training									
G 2.17	Internal Audits									

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)					
		10 pts	5 pts	-10 pts	N.A.	not passed								
G 2	General Requirements for the Stage Food Proc	essing/I	Prepara	tion										
G 3	Specific Requirements for Plant-Based Raw Materials, Honey and Salmon													
G 3.1	Sampling and Testing													
G 3.1.1	Sampling and Testing Plan													
G 3.1.2	Sampling and Commissioning a Laboratory													
G 3.1.3	Frequency of Sampling and Testing													
G 3.1.4	Evaluation of Test Results													

#### VLOG "Ohne Gentechnik" Production and Certification Standard - Combi-Checklist Stages B+G\_ Food Processing/Preparation + Logistics

Business:			
Identification number if available:			
VLOG-ID (10-xxxxx):			
Audit participant business:			
Sites that have been audited incl. Adress and VLOG-Sub-ID (10-xxxxx-A/B/etc.):			
Scope of certification:			
Business risk grading		1	
(transferred from facility description):	Auditor:	Correction Evaluator:	

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

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	250
Number of evaluated criteria	0

Audit resul	t
Achieved percer	ntage:
missing or inc	orrect entries!

Auditor's signature:

Business's signature:

		[	Gradin	ıg (plea	ise sele	ct with	"x")		Corrective ac	tions
No. in Standard	Topic in Standard				C	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
G 2	General Requirements for Food Processing,	/Prep	paratio	n Stage	;	<u> </u>	•			•
G 2.1	Standard Usage Agreement with VLOG									
G 2.2	Facility Description									
G 2.3	Assignment of Responsibilities, Organisational Chart									
G 2.4	Risk Management	ко								
G 2.5	Commissioning External Service Providers									

No. in Standard	Topic in Standard		Α	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts	5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements for Food Processing	/Prep	paratio	n Stage				·		
G 2.6	Incoming Goods Inspection	КО								
G 2.7	Segregation of Goods Flows, Exclusion of Contamination	ко								
G 2.8	Handling of Non-compliant Raw Materials/Products	ко								
G 2.9	Inspection of Outgoing Goods, Labelling on Bills of Lading	ко								
G 2.10	Traceability	ко								
G 2.11	Complaint Management									

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
G 2	General Requirements for Food Processing/	/Prep	paration	n Stage		1		L	L	
G 2.12	Goods Recall									
G 2.13	Crisis Management	ко								
G 2.14	Corrective Action, Ongoing Improvement Process									
G 2.15	Documentation and Retention Period									
G 2.16	Staff Training									
G 2.17	Internal Audits									

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)					
		10 pts	5 pts	-10 pts	N.A.	not passed								
G 2	General Requirements for Food Processing/Pre	paratio	n Stage	!										
G 3	Specific Requirements for Plant-Based Raw Materials, Honey and Salmon													
G 3.1	Sampling and Testing													
G 3.1.1	Sampling and Testing Plan													
G 3.1.2	Sampling and Commissioning a Laboratory													
G 3.1.3	Frequency of Sampling and Testing													
G 3.1.4	Evaluation of Test Results													

No. in Standard	Topic in Standard	A	В	С	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
		10 pt	s 5 pts	-10 pts	N.A.	not passed			
G 2	General Requirements for Food Processing/Pro	eparati	on Stage	e					
B 4	Specific Requirements for Transport, Storage,	Handlin	g and/o	or Trade	;				
B 4.2	Sampling and Testing								
В 4.2.1	Sampling and Testing Plan								
В 4.2.2	Sampling and Commissioning a Laboratory								
B 4.2.3	Frequency of Sampling and Testing								
B 4.2.4	Evaluation of Test Results								

## **Group description**

#### Group organiser:

SaGroRe GmbH

Sample street 12, 54321 Sample town

#### Responsible for group certification:

Sam Sample (QM Officer of SaGroRe GmbH)

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

#### Activities of group members:

Sample text: The members of the SaGroRe VLOG group are branches of SaGroRe GmbH, in which bulk food of animal origin that meets the requirements of the VLOG Standard is sold directly to consumers [...].

The branches further process bulk food of animal origin. The processing is organised as follows:

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

#### Contractors, subcontractors and outsourced processes:

The following contractors are included in the SaGroRe group:

#### Areas of responsibility of the group organiser:

Sample text: SaGroRe is responsible for risk management of distributing "VLOG" quality bulk food of animal origin and has a crisis management system, in which the group members are integrated [...].

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

SaGroRe GmbH carries out an internal audit of the branches annually. [...]

#### Basis for the initial and subsequent certifications

[centrally purchased or purchased locally by the branches, 10 %- or 100 % process]

Sample text: SaGroRe's purchasing of "VLOG" food is centrally regulated. Therefore, in addition to the audit of the group organiser, the certification body will carry out random audits annually at 10% of the branches.

Or:

SaGroRe's purchasing of "VLOG" food is regulated on a decentralised basis. The certification body will carry out audits of the group organiser and 100% of the branches annually.

#### Use of several certification bodies

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

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

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

B-cert will audit [see list above]. C-cert will audit [see list above].

*B*-cert and C-cert give their audit results to A-cert, which will issue the VLOG certificate to the group. There is an agreement between the certification bodies for the exchange of data.

#### Other documents

[integrated into the group description or as extra documents]

<u>Organisational chart:</u> Organisational chart of the business incl. responsibilities and a representation plan to cover absences in operating procedures relevant to "Ohne Gentechnik".

<u>List of products</u>: Overview or specifications for bulk "Ohne Gentechnik" goods offered by the business, including consideration of re-working

For further processing of bulk "Ohne Gentechnik" goods and the use of further ingredients which are not purchased from VLOG certified suppliers (e.g. marinades, spice blends): A list of all formulations with quantity or weight-related information on "Ohne Gentechnik" ingredients and components, including consideration of re-working

List of suppliers: All authorised suppliers of "Ohne Gentechnik" food/ingredients

#### Please attach a current list of your members according to the template described below.

Members list attached

VLOG Standard	Group Description in Retail –	
Annex 27	Sale of Bulk Goods	Version 01.09.21
Annex 27	including Members List	

This section contains a sample template of a member list for group certification in agriculture. The group organiser must always keep the member list up to date. The group organiser has to promptly notify the certification body of any relevant changes. The following member list below or a member list with equivalent content may be used. [Information in boldface is mandatory according to the Standard; the remainder is recommended.]

#### List of members/sites exemplary

Name/ Branch	Address	Centralised or decentralised purchase	Group member since	Most recent routine audit/initial audit by the certification body	Responsible certification body <sup>1</sup>
SaGroRe Sampletown	Sample street 2, 87654 Sample town	centralised	[Date]	[Date]	A-Cert
Retail site, city, Sample city	Main street 1, 54321 Sample city	decentralised	[Date]	Has not yet taken place	C-Cert
[]					

<sup>&</sup>lt;sup>1</sup> Only relevant if the group uses multiple certification bodies for VLOG certification

### VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage H\_ Retail - Sale of bulk food of animal origin (Central Office)

Business:		
Identification number if available:		
VLOG-ID (10-xxxxx):		
Audit participant business:		
Sites that have been audited (incl. adress):		
Scope of certification:		
Centralised or decentralised purchase of VLOG food/raw materials	□ centralised	□ decentralised

Is the "Ohne GenTechnik" seal used?

□ yes □ no

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

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

Auditor's signature:

Business's signature:

V25.01

		G	iradin	ıg (plea	se sele	ct with	" x ")		Corrective	actions
No. in Standard	Topic in Standard	A			С	N.A.	ко	Evaluation/Explanation		Responsibility/ dates/status (business)
		10	0 pts		-10 pts	N.A.	not passed			
H 2	Requirements for Group Organisers and G	iroup N	Nemb	pers						
H 2.1	Standard Usage Agreement with VLOG									
H 2.2.1	Group description									
H 2.2.2	Members list									
Н 2.3	Contractual Binding of the Group I Members	ко								
H 2.4	Risk Management	ко								

No. in Standard	Topic in Standard	1	A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
H 2.5	Approval of Suppliers and Articles									
H 2.6	Incoming Goods Inspection	ко								
H 2.7	Segregation of Goods Flows/Exclusion of Contamination	КО								
H 2.8	Processing									
H 2.9	Training of Staff and Group Members									
H 2.10	Handling of Non-compliant Raw Materials/Products	ко								

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts		-10 pts	N.A.	not passed			
H 2.11	Labelling									
H 2.12	Traceability	ко								
H 2.13	Crisis Management	ко								
H 2.14	Corrective Action, Ongoing Improvement Process									
H 2.15	Documentation and Retention Periods									
H 2.16	Internal Audits									

#### VLOG "Ohne Gentechnik" Production and Certification Standard - Checklist Stage H\_ Retail - Sale of bulk food of animal origin (Branch)

Business:	
Identification number if available:	
VLOG-ID (10-xxxx):	
Audit participant business:	
Sites that have been audited (incl. adress):	
(	
Scope of certification:	
Centralised or decentralised purchase of VLOG food/raw materials	□ centralised □ decentralised

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

Grading	
Number of A-gradings	0
Number of B-gradings	0
Number of C-gradings	0
Number of N.Agradings	0
Number of KO-gradings	0
Total points	0
Maximum achievable number of points	120
Number of evaluated criteria	0

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

Auditor's signature:

Business's signature:

				ase sele	ct with	" x ")		Correctiv	e actions
No. in	Topic in Standard	Α	В	С	N.A.	КО	Evaluation/Explanation	Corrective action (business)	Responsibility/
Standard									dates/status (business)
		10 pt	5 pts	-10	N.A.	not			
				pts		passed			
H 2	Requirements for Group Organisers and G	roup Mem	bers						
H 2.5	Approval of Suppliers and Articles								
H 2.6	Incoming Goods Inspection	ко							
Н 2.7	Segregation of Goods Flows/Exclusion of I Contamination	ко							
H 2.8	Parameter								
H 2.8	Processing								
H 2.9	Training of Staff and Group Members								
H 2.10	Handling of Non-compliant Raw I Materials/Products	ко							

No. in Standard	Topic in Standard		A	В	с	N.A.	ко	Evaluation/Explanation	Corrective action (business)	Responsibility/ dates/status (business)
			10 pts				not			
					pts		passed			
H 2.11	Labelling									
H 2.12	Traceability	КО								
H 2.13	Crisis Management	КО								
H 2.14	Corrective Action, Ongoing Improvement Process									
H 2.15	Documentation and Retention Periods									
H 2.16	Internal Audits									

#### Agricultural operation, address (company stamp, if applicable):

## Mobile facilities only:

Operator, address (business stamp, if applicable):

#### licence plate number:

#### Previous feed mixture produced from:

exclusively feed not subject to compulsory labelling\*

(including) the following feeds subject to compulsory labelling\*\*:

Measures implemented to prevent carryover of GMO feed:

Complete discharge

Purges, consisting of type and amount:

Where was the purge batch used?:

#### Feed used for the production of "VLOG mixtures":

Designation compound feed (animal type/category/phase):				
Feed material	Silo no./ designation/ storage location	Amount (kg)		
	Total:			

With their signature below, both the agricultural business and the facility operator confirm the accuracy of the above information.

#### DATE

BUSINESS SIGNATURE

#### SIGNATURE OF FACILITY OPERATOR

1/1

\*Feed which is not subject to compulsory labelling as "genetically modified" according to Regulations (EC) No. 1829/2003 or No. 1830/2003

Note: In case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective matrix locations. Please use the VLOG Matrix Certification Incident Sheet for this purpose.

# 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant feed is placed on the market as "VLOG geprüft" or with the "VLOG geprüft" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of feed manufacturing and logistics:

- GMO feed subject to compulsory labelling under EU Regulations 1829/2003 and 1830/2003<sup>1</sup> was marketed as "VLOG geprüft"<sup>2</sup>
- Feed containing GMOs that are not approved in the EU was marketed as "VLOG geprüft"<sup>3</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

## 2. How should incidents be reported to VLOG?

Certified businesses must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG. In this case, each business has to fill out a separate incident sheet, but one incident sheet can be used for multiple locations of a single business. In the case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective matrix locations.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: ereignisfall@ohnegentechnik.org
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an incident report).

# As a general rule, the sooner a case is reported to VLOG the better, even if the information is still incomplete.

#### 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

 $^{\rm 2}$  Guidance for the control of GMOs in feed can be found here:

https://www.ohnegentechnik.org/fileadmin/user\_upload/01\_unternehmen/e\_standards/e1\_der\_vlog\_standard/Further\_Document s/BVL\_Guideline\_for\_Monitoring\_GMOs\_in\_Feed\_Version3.pdf

<sup>&</sup>lt;sup>1</sup> Under those regulations, the GMO content of the feed components may not exceed 0.9 %. Values between 0.1 % and 0.9 % are only permissible if they are accidental or technically unavoidable.

<sup>&</sup>lt;sup>3</sup> The quantity of non-approved GMOs in the feed is irrelevant.

Sign and submit to VLOG e.V.: Email: ereignisfall@ohnegentechnik.org Fax: +49 (0)30 2359 945 01 VLOG contact data for emergency incidents: VLOG Head Office: +49 (0)30 2359 945 00 Outside of business hours: +49 (0)30 2359 945 09

#### 1. Information regarding the business

Name of Business					
Business Activity Area	Logistics stage				
	(Drop) shipping	Storage/handling Transport			
	Feed Manufacturing	g stage			
	Manufacturing/p	processing Grinding and mixing facility			
	Business is part of a	a VLOG matrix certification			
Business Address	Street address				
	Postal code, city				
	Country				
VLOG ID <sup>4</sup>	· · · · ·				
Emergency contact	Name				
person for VLOG	Telephone number				
	Email/Fax				
VLOG certification	Name				
body	The certification body has already been informed of the incident $\rightarrow$ If this				
	is not the case, ple	ase do so immediately			
Business locations					
affected by the					
incident (including					
Sub ID, if any):					

#### 2. Information regarding the incident

#### Type of incident

Positive GMO test result for a feed sample Contamination within the business (e.g. feed in the wrong silo) Contamination in another business: Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you become aware of the incident?

<sup>&</sup>lt;sup>4</sup> Businesses that are part of a matrix certification don't have their own VLOG IDs. Please enter the name of the matrix organiser.

#### Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production – date of manufacture:

Feed purchased from a supplier:

Address:

Contact person:

Delivery date:

Supplier VLOG certified/certification recognized as equivalent

Yes:

Feed in contract manufacturing for:

Address:

No

Contact person:

Unique name of the feed (commercial name)		
Type of feed	Feed material Other:	Compound feed
Quality of feed	"VLOG verified" Not subject to compul	Recognised as equivalent sory labelling
Batch no/delivery slip no		
Total quantity affected	thereof alread	y placed on the market
Marketing period	to	

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>5</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

#### Test results (Please list additional results on a separate sheet)

#### A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>6</sup>	
Test result (PCR):	%
Amount of GMO content	%
per species (e.g. soy, corn)	%
Test laboratory	

No GMO test was conducted

#### 3. Measures

What measures have you taken or are planning to take? When were they taken or will be taken?

Place	Date

Signature

<sup>5</sup> Unless otherwise contractually agreed

<sup>6</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like

Note: In case of a matrix certification, the matrix organiser can assume (pooled) reporting responsibility for the respective members. Members are not required to submit separate incident reports in that case.

# 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant feed is placed on the market as "VLOG geprüft" or with the "VLOG geprüft" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of feed manufacturing and logistics:

- GMO feed subject to compulsory labelling under EU Regulations 1829/2003 and 1830/2003<sup>1</sup> was marketed as "VLOG geprüft"<sup>2</sup>
- Feed containing GMOs that are not approved in the EU was marketed as "VLOG geprüft"<sup>3</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

# 2. How should incidents be reported to VLOG?

The matrix organiser must notify VLOG about any incidents. The matrix organiser assumes (pooled) reporting responsibility for the respective matrix members. All cases should be reported, even if the organiser is uncertain whether a situation represents an incident or not.

If the matrix organiser does not report the incident, each business must fill out its own *Feed Manufacturer and Logistics Incident Sheet*.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: ereignisfall@ohnegentechnik.org
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

# As a general rule, the sooner a case is reported the better, even if the information is still incomplete.

# 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

<sup>2</sup> Guidance for the control of GMOs in feed can be found here:

<sup>&</sup>lt;sup>1</sup> Under those regulations, the GMO content of the feed components may not exceed 0.9 %. Values between 0.1 % and 0.9 % are only permissible if they are accidental or technically unavoidable.

https://www.ohnegentechnik.org/fileadmin/user\_upload/01\_unternehmen/e\_standards/e1\_der\_vlog\_standard/Further\_Document s/BVL\_Guideline\_for\_Monitoring\_GMOs\_in\_Feed\_Version3.pdf

 $<sup>^{\</sup>rm 3}$  The quantity of non-approved GMOs in the feed is irrelevant.

Sign and submit to VLOG e.V.: Email: <u>ereignisfall@ohnegentechnik.org</u> Fax: +49 (0)30 2359 945 01 VLOG contact data for emergency incidents:

VLOG Head Office:	+49 (0)30 2359 945 00
Outside of business hours:	+49 (0)30 2359 945 09

# 1. Information regarding the matrix organisation

Name of matrix organisation					
Activity area of VLOG matrix	Logistics Stage				
	(Drop) shipping Storage/handling Transport				
	Feed Manufacturing Stage				
	Manufacturing/Processing Grinding and mixing facility				
Address of matrix organisation	Street address				
	Postal code, city				
	Country				
VLOG ID					
Emergency contact person for	Name				
VLOG	Telephone number				
	Email/Fax				
VLOG certification body	Name				
	The certification body has already been informed of the				
	incident $\rightarrow$ If this is not the case, please do so immediately				
Matrix sites/members affected by the incident					
(more) see annex					

#### 2. Information regarding the incident

#### Type of incident

Positive GMO test result for a feed sample

Contamination in the business (e.g. feed in the wrong silo)

Contamination in another business:

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When was the incident first noticed (by you or the matrix site?)

#### Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production – date of manufacture:

Feed purchased from a supplier:

Address:

Contact person:

Delivery date:

Supplier VLOG certified/certification recognized as equivalent

No Yes:

Feed in contract manufacturing for:

Address:

Contact person:

Unique name of the feed (commercial name)		
Type of feed	Feed material	Compound feed
	Other:	
Quality of feed	"VLOG verified"	Recognised as equivalent
	Not subject to compu	lsory labelling
Batch no/delivery slip no		
Total quantity affected	thereof already p	laced on the market
Marketing period	to	

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing <sup>4</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

#### Test results (Please list additional results on a separate sheet)

A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>5</sup>	
Test result (PCR):	%
Amount of GMO content	%
per species	%
(e.g. soy, maize/corn)	
Test laboratory	

No GMO test was conducted

#### 3. Measures

What measures have you taken or are you planning to take? When were they taken or will be taken?

Place	D

ate

Signature

<sup>5</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like

<sup>&</sup>lt;sup>4</sup> Unless otherwise contractually agreed

Note: For VLOG group certifications, the group organiser can assume (pooled) reporting responsibility for group members (cf. VLOG Incident Sheet for Agricultural Group Organiser). Farmers are not required to submit separate incident reports.

# 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant animals or food is placed on the market with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of agriculture and livestock trade:

- Animals/animal products were marketed as "VLOG" or with the "Ohne GenTechnik" seal, although they do not meet the requirements of the VLOG Standard (e.g. required minimum feeding conversion period was not (yet) met by the time of sale; GMO feed subject to compulsory labelling was fed, so that the minimum feeding conversion period had to be started over)<sup>1</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

# 2. How should incidents be reported to VLOG?

The certified business must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG. In this case, each business has to fill out a separate incident sheet. If the group organiser reports the incident for group certifications, individual group members are not required to repot it separately. One incident sheet can be used for multiple locations of a single business.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: <u>ereignisfall@ohnegentechnik.org</u>
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

# As a general rule, the sooner a case is reported the better, even if the information is still incomplete.

# 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incidents and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

<sup>&</sup>lt;sup>1</sup> Guidance for the control of GMOs in feed can be found here:

https://www.ohnegentechnik.org/fileadmin/user\_upload/01\_unternehmen/e\_standards/e1\_der\_vlog\_standard/Further\_Document s/BVL\_Guideline\_for\_Monitoring\_GMOs\_in\_Feed\_Version3.pdf

Sign and submit to VLOG e.V.: Email: ereignisfall@ohnegentechnik.org Fax: +49 (0)30 2359 945 01 VLOG contact data for emergency incidents:VLOG Head Office:+49 (0)30 2359 945 00Outside of business hours:+49 (0)30 2359 945 09

### 1. Information regarding the business

Name of business		
Business activity area	Agriculture Animal production: Plant-based feed production for own facility Livestock transport/livestock trade Business is part of a VLOG group certification	
	Street address	
Business address	Postal code, city	
	Country	
VLOG ID (or the name of the organiser <sup>2</sup> )		
	Name	
Emergency contact person for VLOG	Telephone number	
	Email/Fax	
VLOG certification	Name	
body		on body has already been informed of the incident $\rightarrow$ If the case, please do so immediately
Business locations affected by the incident (including Sub ID, if any):		

# 2. Information regarding the incident

# Type of incident

Feed containing GMOs was fed to VLOG animals, so that the minimum feeding conversion period must restart

Animals/products were marketed as "VLOG" although the requirements of the VLOG Standard were not met (e.g. minimum feeding conversion period not met) Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you become aware of the incident?

<sup>&</sup>lt;sup>2</sup> Businesses that are part of a group certification do not have their own VLOG IDs. Enter the name or VLOG ID of the group organiser.

#### Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production

Compound feed from mobile/jointly used or stationary/business-owned grind and mixing facility

Feed purchased from a supplier:

Address:

No

Contact person:

Delivery date:

#### Supplier VLOG certified/certification recognized as equivalent

Yes:

Feed name (commercial name)		
Type of feed	Feed material Other:	Compound feed
Quality of feed	"VLOG verified"	Recognised as equivalent
Total quantity affected	Not subject to comp Amount already	, <u>,</u>
Batch no/delivery slip no		
Feeding period	to	

Which animals and products were affected by the incident? (animal type/number/barn/product amounts)

#### Test result (Please list additional results on a separate sheet)

A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>3</sup>	
Test result (PCR):	%
Amount of GMO content per	%
species (e.g. soy, maize/corn)	%
Test laboratory	

No GMO test was conducted

#### 3. Measures

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>4</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

What measures have you taken or are you planning to take? When were they taken or will be taken?

Place

Date

Signature

<sup>3</sup> E.g. at delivery of feed, test completed by supplier, or other

<sup>4</sup> Unless otherwise contractually agreed

Note: In case of a VLOG group certification, the group organiser can assume (pooled) reporting responsibility for the respective group members, using the Agricultural Group Organiser Incident Sheet.

# 1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant animals or food is placed on the market with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of agriculture:

- Animals/animal products were marketed as "VLOG" or with the "Ohne GenTechnik" seal, although they do not meet the requirements of the VLOG Standard (e.g. required minimum feeding conversion period was not (yet) met by the time of sale; GMO feed subject to compulsory labelling was fed, so that the minimum feeding conversion period had to be started over)<sup>1</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

# 2. How should incidents be reported to VLOG?

The VLOG group organiser must notify VLOG about any incidents. In doing so, the group organiser assumes (pooled) reporting responsibility for the respective group members. All cases should be reported, even if the group organiser is uncertain whether a situation represents an incident or not.

If the group organiser does not report the incident, each business must fill out its own *Agricultural and Livestock Trade Incident Sheet*.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: <u>ereignisfall@ohnegentechnik.org</u>
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

# As a general rule, the sooner a case is reported to VLOG the better, even if the information is still incomplete.

#### 3. Who can I contact if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

<sup>&</sup>lt;sup>1</sup> Guidance for the control of GMOs in feed can be found here:

https://www.ohnegentechnik.org/fileadmin/user\_upload/01\_unternehmen/e\_standards/e1\_der\_vlog\_standard/Further\_Document s/BVL\_Guideline\_for\_Monitoring\_GMOs\_in\_Feed\_Version3.pdf

Sign and submit to VLOG e.V.: Email: ereignisfall@ohnegentechnik.org Fax: +49 (0)30 2359 945 01 VLOG contact data for emergency incidents:VLOG Head Office:+49 (0)30 2359 945 00Outside of business hours:+49 (0)30 2359 94509

### 1. Information regarding the group organiser

Name of business		
Business address	Street address	
	Postal code, city	
	Country	
VLOG ID		
Emergency contact	Name	
person for VLOG	Telephone number	
	Email/Fax	
VLOG certification body	Name	
		on body has already been informed of the incident s not the case, please do so immediately
Group members affected by the incident:		
anceted by the meldent.		
(more) see annex		

# 2. Information regarding the incident

#### Type of incident

Feed containing GMOs was fed to VLOG animals, so that the minimum feeding conversion period must restart

Animals/products were marketed as "VLOG" although the requirements of the VLOG Standard were not met (e.g. minimum feeding conversion period, accidental swapping of animals/products)

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When was the incident noticed (by you and/or the group member)?

# Feed affected by the incident (please list additional feed on a separate sheet)

Feed from own production

Feed from mobile/jointly used or stationary/business-owned mixing and grinding facility

Feed purchased from a supplier:

Address:

No

Contact person:

Delivery date:

#### Supplier VLOG certified/certification recognized as equivalent

Yes:

Feed name (commercial name)		
Type of feed	Feed material Other:	Compound feed
Quality of feed	"VLOG verified" Not subject to com	Recognised as equivalent pulsory labelling
Total quantity affected	Amount already fed to animals	
Batch no/delivery slip no		
Feeding period	to	

Which animals and products were affected by the incident? (animal type/number/barn/product amounts)

#### Test result (Please list additional results on a separate sheet)

A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>2</sup>	
Test result (PCR):	%
Amount of GMO content per	%
species (e.g. soy, maize/corn)	%
Test laboratory	

No GMO test was conducted

#### 3. Measures

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>3</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

What measures have you taken or are you planning to take? When were they taken or will be taken?

Place

<sup>3</sup> Unless otherwise contractually agreed

 $<sup>^{\</sup>rm 2}$  E.g. at delivery of feed, test completed by supplier, or other

1. What are "incidents" within the meaning of the VLOG Standard?

"Incidents" are scenarios in which non-VLOG-compliant food is placed on the market as "VLOG" or with the "Ohne GenTechnik" seal, the reputation of VLOG is at risk or the VLOG system is otherwise jeopardised.

The following situations are particularly relevant in the areas of food processing and logistics as well as retail:

- Food that does not meet the requirements of the EC Genetic Engineering Implementation Act<sup>1</sup> was marketed as "VLOG" or with the "Ohne GenTechnik" seal
- Food containing GMOs that are not approved in the EU was marketed as "VLOG" or with the "Ohne GenTechnik" seal<sup>2</sup>
- Reasonable suspicion that a business is engaging in non- VLOG-compliant production, (alleged) cases of fraud in the VLOG system (including fraud by business partners or third parties...)
- Public criticism of the business's VLOG production (media inquiries, press reports, articles, etc.)

Regarding communication with media concerning VLOG certification and/or the use of the "Ohne GenTechnik" seal and/or "VLOG geprüft" seal, VLOG must be informed in advance or at least parallel to publication. We will be pleased to advise you and coordinate the communication with the media/third parties with you.

# 2. How should incidents be reported to VLOG?

Certified businesses must notify VLOG about any incidents. All cases should be reported, even if the business is uncertain whether a situation represents an incident or not. All VLOG-certified businesses that are affected by or become aware of an incident (suppliers/customers/farmers/manufacturers, etc.) must report it to VLOG. In this case, each business has to fill out a separate incident sheet, but one incident sheet can be used for multiple locations of a single business.

The incident sheet must be clearly worded and fully filled out with all available data. The sheet must be sent to VLOG as soon as possible and within 2 working days at latest by email or fax following the occurrence of the incident:

- Email: ereignisfall@ohnegentechnik.org
- Fax: +49 30 2359 945 01

Changes/new findings (e.g. second test, results of root cause analysis) can be sent to VLOG at a later date (e.g. as a supplement to an Incident Sheet).

# As a general rule, the sooner a case is reported the better, even if the information is still incomplete.

#### 3. How can VLOG be reached if there is an incident?

- VLOG Head Office: +49 (0)30 2359 945 00 (during business hours)
- VLOG emergency number: +49 (0)30 2359 945 09 (when the office cannot be reached)

After the incident is reported, VLOG will assist you in managing the incident and any resulting crisis situations. The goal is to prevent damage to your facility, other system partners and the VLOG system.

<sup>&</sup>lt;sup>1</sup> This includes, among others, any food that is subject to compulsory labeling as GMO pursuant to EU regulations 1829/2003 and 1830/2003; food with a GMO content > 0,1 % and any products of animal origin in which the statutory minimum feeding period was not complied with.

<sup>&</sup>lt;sup>2</sup> The quantity of non-approved GMOs in the food is irrelevant.

Sign and submit to VLOG e.V.: Email: <u>ereignisfall@ohnegentechnik.org</u> Fax: +49 (0)30 2359 945 01 VLOG contact data for emergency incidents:VLOG Head Office:+49 (0)30 2359 945 00Outside of business hours:+49 (0)30 2359 945 09

# 1. Information regarding the business/retail group organiser

Name of business			
Business activity area	Logistics Stage		
	(Drop) shipping	Storage/handling	Transport
	Food Processing/P	reparation Stage	
	Retail Stage – Sale c	of Bulk Food of Animal O	rigin
Business address	Street address		
	Postal code, city		
	Country		
VLOG ID <sup>3</sup>			
Emergency contact	Name		
person for VLOG	Telephone number		
	Email/Fax		
VLOG certification	Name		
body		ody has already been inf ase do so immediately	formed of the incident $ ightarrow$ If this
Business locations		-	
affected by the			
incident			
(including Sub ID or			
employee, if any):			

# 2. Information regarding the incident

#### Type of incident

Positive GMO test result for raw material/food

Contamination within the business: (e.g. non-compliant raw materials in "VLOG" products)

Contaminsation in another business:

Other:

Brief description of the incident (What happened? What is the (possible) cause?)

When did you learn of the incident?

<sup>&</sup>lt;sup>3</sup> Businesses that are part of a matrix/group certification do not have their own VLOG IDs. Enter the name or VLOG ID of the matrix/group organiser.

# Product affected by the incident (please list additional products on a separate sheet)

Product from own production – date of manufacture:

Purchased product or raw materials purchased from a supplier:

Raw material/product:

Address:

No

Delivery date:

Supplier VLOG certified/certification recognized as equivalent

Yes:

Product in contract manufacturing for:

Raw material/product:

Address:

Contact person:

Contact person:

Unique name of the	
product (commercial name)	
Item description according	
to specification	
Batch no/delivery slip no	
Total quantity affected	thereof already placed on the market
Marketing period	to

Affected business partners (esp. customers and suppliers) have been informed of the incident by telephone and in writing<sup>4</sup>

A list of affected customers is attached. The list includes quantities and delivery dates.

#### Test result (Please list additional results on a separate sheet)

A GMO test was conducted (attach a copy of the test report, if available)

Sample taken by:	
Date sample taken	
Sampling location <sup>5</sup>	
Test result (PCR):	%
Amount of GMO content	
per species (e.g. soy,	%
maize/corn)	%
Test laboratory	

No GMO test was conducted

#### 3. Other information/measures

What measures have you taken or are you planning to take? When were they taken or will be taken?

Place	Date

Signature

<sup>4</sup> Unless otherwise contractually agreed

<sup>5</sup> E.g. internal incoming goods or outgoing goods department if delivery was made to a customer or the like