

Certification Body Recognition Agreement **between**

the Verband Lebensmittel ohne Gentechnik e.V., Friedrichstrasse 153a, 10117 Berlin, Germany

- hereinafter “VLOG” -

and

the certification body

VLOG-Recognition No.: _____

Terminology

EGGenTDurchfG: EC Genetic Engineering Implementation Act as amended from time to time

VLOG Standard: VLOG “Ohne Gentechnik” Production and Certification Standard as amended from time to time.

VLOG certificate: Confirmation of successful compliance with the VLOG “Ohne Gentechnik” Production and Certification Standard issued by a certification body recognised by VLOG.

VLOG licensee: A company that has made a contractual agreement with VLOG for the use of the “Ohne GenTechnik” food seal, the “VLOG geprüft” feed seal or another of VLOG’s protected trademarks.

Recognition Guideline: Guideline for Certification Bodies, Auditors, Evaluators and Certifiers as amended from time to time.

Certification Body Integrity Audits: Super-audits conducted at the certification body by VLOG personnel or other persons hired by VLOG. These super-audits involve inspection of written and/or electronic documents to verify compliance with the requirements of the Recognition Guideline and the VLOG Standard.

Witness Integrity Audits: Super-audits conducted at VLOG-certified businesses by VLOG personnel or other persons hired by VLOG. These -super-audits involve observing the certification body’s auditor during the performance of a regular VLOG audit of a business to evaluate audit practices.

Business day: Monday to Friday

Non-exclusive auditor: VLOG-recognised auditor who works for more than one VLOG-recognised certification body.

Penalty Committee: The Penalty Committee is appointed as a neutral body to determine penalty actions. The Penalty Committee comprises selected representatives of the user groups integrated into VLOG and an attorney designated by the VLOG head office. The Committee will always consist of five persons: an attorney (Chair) and one business representative from each of the following areas: the feed industry, the food processing industry and the food retailing industry, as well as a representative of a VLOG-recognised certification body.

Penalty procedure: The following documents govern the procedure by which VLOG or the VLOG Penalty Committee imposes penalties: Guideline for Dealing with Violations, Classification of Violations by Certification Bodies, Classification of VLOG Auditors' Violations, Schedule of Penalties for Certification Bodies' Violations and Schedule of Penalties for VLOG Auditors' Violations.

Preamble

The VLOG Standard is published to ensure standardisation of "Ohne Gentechnik" certifications at a high level of quality. Certification bodies shall therefore issue certificates of conformity with the criteria of the EGGenTDurchfG exclusively on the basis of the VLOG Standard.

This Agreement regulates the application of the VLOG Standard by the certification body and the acceptance of certificates by VLOG. This Agreement is a prerequisite for recognition of the certification body by VLOG.

Section 1 Subject of the Agreement

- (1) The certification body is recognised by VLOG upon conclusion of the Certification Body Recognition Agreement. If the certification body is suspended under the penalty procedure, the certification body shall continue to be recognised by VLOG, but may not conduct any VLOG certifications during the suspension period.
- (2) The Parties agree that the VLOG "Ohne Gentechnik" Production and Certification Standard and the Guideline for Certification Bodies, Auditors, Evaluators and Certifiers as well as the documents relating to the penalty procedure as amended are the subject of this Agreement. These documents are available for download on the VLOG website at www.ohnegentechnik.org.
- (3) The certification body shall only conduct audits and certifications according to the VLOG Standard and issue VLOG certificates for the duration of its recognition by VLOG.
- (4) VLOG shall accept VLOG certificates of conformity with the requirements of the VLOG Standard, which are issued by the certification body based on VLOG Standard-compliant auditing and certification processes.
- (5) VLOG shall identify the certification body as a VLOG-recognised certification body on a publicly accessible list on the VLOG website, www.ohnegentechnik.org. If the certification body is suspended under the penalty procedure, notice of the suspension shall be published on the VLOG website.
- (6) Within the scope of this Agreement, VLOG authorises the certification body, for the duration of the recognition, to use the "Ohne GenTechnik" and "VLOG geprüft" seals (Annex 1) on VLOG certificates as well as in service descriptions and advertisements in print and digital form. The

printing templates of the aforementioned seals are available on the VLOG website www.ohnegenteknik.org.

Section 2 Compliance with Requirements

- (1) The certification body agrees to comply with the requirements of the VLOG Standard and the Recognition Guideline as amended from time to time during the period of recognition.
- (2) Certificates according to the VLOG Standard require compliance with the VLOG Standard by the audited business as well as the presence of a valid Standard Usage Agreement between VLOG and the certification body's client in which the use of the VLOG Standard is regulated. The certification body agrees to check whether the business to be certified has concluded a Standard Usage Agreement prior to issuing the certificate.
- (3) The certification body may only issue VLOG certificates if requirements of the VLOG Standard and the Recognition Guideline were complied with. This includes the additional requirements of the QA supplementary module, which VLOG has recognised as equivalent to the VLOG Standard.
- (4) Audits and certifications after the publication of an updated VLOG Standard version may only be carried out according to the requirements of the respective new version of the VLOG Standard. Any other procedure must be approved by VLOG in advance. In general, updates to the VLOG Standard will come into effect on 1 January of a given year. VLOG shall ensure that the respective new VLOG Standard is made available to the certification body in a timely manner before coming into effect (usually 4 months in advance).

Section 3 Disclosure of Information

- (1) The certification body agrees to use VLOG's ECERT Certification Body Portal to meet its information disclosure obligations in accordance with the Recognition Guideline.
- (2) The certification body shall make results and laboratory reports available to VLOG no more than eight weeks after receipt of the results of tests which the certification body has commissioned according to the VLOG Standard and which are connected to the "Ohne Gentechnik" production of a business under audit by the certification body according to the VLOG Standard. The information shall be transmitted to VLOG by e-mail until the respective function is available in the ECERT Certification Body Portal.
- (3) If a VLOG certificate is withdrawn from a business or a VLOG certification is suspended, the certification body shall give VLOG written notice within five business days on its own initiative. This shall not apply to reporting the termination of a VLOG certificate according to the VLOG Standard (e.g., based on a KO evaluation), which must be reported to VLOG within two business days.
- (4) The certification body shall give VLOG written notice within five business days on its own initiative if the agreement between the certification body and a business certified according to the VLOG Standard expires or is terminated.
- (5) The certification body shall give VLOG written notice of any significant changes relating to the contractual agreement between VLOG and the certification body (e.g., a change of the VLOG contact person, a name change, etc.) within five business days on its own initiative.

- (6) The certification body shall notify VLOG within five business days if the requirements for certification bodies under the Recognition Guideline are no longer met.

Section 4 Integrity Audit Programme

- (1) The certification body shall permit VLOG, or a person hired by VLOG, to examine and evaluate the audits and certifications conducted according to the VLOG Standard within the framework of pre-scheduled Certification Body Integrity Audits. This person shall not be under contract with a competing certification body. Once per super-audit, the certification body shall be allowed to reject a person suggested by VLOG and/or to reject an announced audit date.
- (2) The certification body shall permit VLOG, or a person hired by VLOG, to conduct pre-scheduled Witness Integrity Audits. This person shall not be under contract with a competing certification body. Once per super-audit, the certification body shall be allowed to reject a person suggested by VLOG and/or reject an announced audit date.
- (3) The costs of the routine super-audits referred to in Secs. 4 (1)(1) and (2) shall be borne by VLOG. The costs of ad-hoc super-audits of suspicious cases, recognition renewals or to check whether actions have been taken shall be borne by the certification body.
- (4) The certification body agrees to implement all measures required by VLOG following a super-audit in accordance with Sec. 4 (1) and (2) within the designated time limits. The business shall be informed of these measures in writing.

Section 5 Data Protection and Non-Disclosure

- (1) VLOG is the owner of all data collected and stored in connection with audits of VLOG businesses within the meaning of data protection law. This is not altered by the certification body's authorisation to process and store VLOG data as part of its assignment.
- (2) The certification body is responsible for handling all information received or created during certification activities. With the exception of information made public by the VLOG business or subject to an agreement between the certification body and the VLOG business (e.g., information needed to respond to complaints), all other information shall be deemed protected and considered confidential. The certification body must give the VLOG business advance notice of any information it intends to make freely available.
- (3) If the certification body is required by law or authorised by contractual agreement to disclose confidential information, the affected VLOG business must be notified of the information provided, unless prohibited by law.
- (4) Information about the VLOG business, which originates from sources other than the business itself (e.g., complainants, authorities), must be treated as confidential.
- (5) As the owner and sole beneficiary of all data related to VLOG certification VLOG may demand the surrender such data at any time. In no case does the certification body have a right to withhold such data.
- (6) The certification body agrees to use any personal data as defined by the General Data Protection Regulation (Regulation (EU) 2016/679), which VLOG supplies for the performance of its certification tasks, solely for the purpose of fulfilling this Agreement.

- (7) Moreover, the certification body agrees to maintain data secrecy with respect to third parties, to instruct all employees entrusted with the performance of tasks under this Agreement regarding their obligations under the General Data Protection Regulation and to require them to maintain data secrecy. The certification body shall take all necessary technical measures to implement the legally required and contractually stipulated level of data protection and shall promptly document them to VLOG upon request.
- (8) The ECERT database provided for the purpose of collecting and processing data may only be used within the scope of the performance of this Agreement. The certification body is expressly prohibited from disseminating or disclosing data to persons and institutions without authorisation from VLOG. If a business is audited by multiple certification bodies, the certification body agrees to consider the data of other participating certification bodies protected and shall treat it as confidential.
- (9) Therefore, the certification body shall take all necessary actions to ensure that unauthorised third parties cannot access the ECERT database and the data contained therein.

Section 6 Contract Term/Termination of the Agreement

- (1) This Agreement shall be limited to three years and shall automatically extend by two years in each case, unless it is terminated with a notification period of three months.
- (2) During the term, this Agreement can also be terminated for cause with immediate effect. A termination for cause shall be in writing to be effective.
- (3) VLOG shall be able to terminate this Agreement for cause, in particular if:
 - a) the certification body issues a VLOG certificate by wilful intent or gross negligence although the conditions of the VLOG Standard for doing so were not fulfilled by the certified business.
 - b) the certification body issues a VLOG certificate by wilful intent or gross negligence although the conditions of the VLOG Standard for doing so were not fulfilled by the certification body.
 - c) the certification body fails to meet its cardinal contractual duties on an ongoing basis.
 - d) another requirement for a termination according to the Schedule of Penalties is fulfilled.
 - e) the data protection and non-disclosure provisions have been violated.

Termination shall be made in writing, terminating the contractual relation with immediate effect.

- (4) The certification body shall be able to terminate this Agreement for cause without giving a reason, effective at the end of the month following the written termination. Paid recognition fees shall not be refunded. The timeliness of the termination notice does not depend on the date of its dispatch, but on the verified date of its receipt.
- (5) Upon termination of the Agreement, the certification body shall provide VLOG with all data and documents related to VLOG certification, in electronic form, on its own initiative. There shall be no right of retaining any information.

Section 7 Fees

- (1) The certification body agrees to pay the recognition fees for certification bodies as established by VLOG, and all other dues, in a timely manner. The amounts of the VLOG fee schedule (as amended) shall apply (Annex 3).

Section 8 Penalties

- (1) Penalties shall be imposed against the certification body and/or its auditors in accordance with Annexes 5 to 9 if VLOG or the Penalty Committee, taking all the available information into consideration and having heard the certification body and/or its auditor, comes to the conclusion that the VLOG Standard and/or the Recognition Guideline has been violated. The certification body and/or the auditor agrees to accept all penalties and take the corrective actions imposed. The VLOG head office and/or the Penalty Committee shall evaluate the violations.
- (2) The certification body shall conclude contracts with its non-exclusive auditors, in which the latter agree to recognise the VLOG Integrity Programme and the VLOG penalty procedure as legally binding and to accept its terms and conditions and their own integration into the VLOG Integrity Programme as well as the penalty procedure. This can be accomplished by a contractual agreement between the certification body and a non-exclusive auditor, with the following sample language: "The auditor recognises that the VLOG Integrity Programme and the VLOG penalty procedure are legally binding on the auditor". The certification body provides the following documents (Guideline for Dealing with Violations, Classification of VLOG Auditors' Violations, Schedule of Penalties for VLOG Auditors' Violations) to the non-exclusive auditor as an integral part of the contract."

Section 9 Final Provisions

- (1) German law shall apply exclusively.
- (2) The place of jurisdiction is the registered office of the VLOG.
- (3) The Parties agree that no verbal or written supplemental arrangements were made outside of this Agreement.
- (4) Should individual provisions of the Agreement be ineffective, this shall not affect the validity of the remaining parts of the Agreement.
- (5) All annexes are an integral part of this Agreement.
- (6) This Agreement replaces any agreements previously made between the Parties with the same regulatory scope.

VLOG:

Location/Date

Signature

Company stamp

Certification body:

Location/Date

Signature

Company stamp

Annexes (as amended from time to time)

- Annex 1: “Ohne GenTechnik” and “VLOG geprüft” seals
- Annex 2: Guideline for Certification Bodies, Auditors, Evaluators and Certifiers
- Annex 3: VLOG Fee Schedule – Membership Dues in “Verband Lebensmittel ohne Gentechnik e.V.” and for VLOG-Recognised Businesses
- Annex 4: VLOG “Ohne Gentechnik” Production and Certification Standard
- Annex 5: Guideline for Dealing with Violations
- Annex 6: Classification of Violations by Certification Bodies
- Annex 7: Classification of VLOG Auditors’ Violations
- Annex 8: Penalties for Violations by VLOG Certification Bodies
- Annex 9: Penalties for Violations by VLOG Auditors



The logos could be downloaded from the VLOG homepage:

www.ohnegentechnik.org/druckvorlagen

Guideline for Certification Bodies, Auditors, Evaluators and Certifiers

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Note: For easier readability, the male form is used in the text for personal designations. Nevertheless, the information refers to members of both genders.

This Guideline describes the requirements that must be met by certification bodies and auditors, evaluators and certifiers for purposes of VLOG auditing and certification.

VLOG certificates will only be recognised if the requirements of this Guideline are met by the auditors, evaluators and certifiers and the certification body, and the certification body is recognised by VLOG.

In addition to the requirements to be met by certification bodies, auditors, evaluators and certifiers, this Guideline also details the approval process for certification bodies.

The list of recognised certification bodies is posted on the VLOG homepage (<https://www.ohnegentechnik.org/zertifizierer/>).

1 Certification Bodies

1.1 Requirements for Certification Bodies

1.1.1 Accreditation

The certification body must demonstrably hold a valid accreditation according to ISO/IEC 17065 in at least one standard for the food and feed industry/ agricultural business.

1.1.2 Quality Management

The certification body's quality management system must describe, ensure, implement and document the following items with respect to VLOG certification/the VLOG Standard:

- **Organisation and responsibility within the certification body**
 - The head of the certification body and the contact person for VLOG and at least one deputy for each must be listed by name.
- **Independence and objectivity of the certification body and the auditors for the activity**
 - The certification body must ensure the independence and objectivity of its certification activities.
 - The certification body must provide sufficient staff to ensure independence and objectivity.
The business and staff must act independently and have had no family/private ties to the businesses to be audited (for at least the last 2 years preceding the audit). Staff members may not have any business relationship with the business to be audited.
- **Auditing and certification**
 - The performance, documentation and evaluation of the audits and certifications must follow the procedure described in the VLOG Standard. In case of suspicious activities of a

VLOG-certified business¹, the certification body will perform additional unannounced audits addressing the suspected problem and will notify the VLOG Head Office.

- **Handling of complaints and protests**

- A documented procedure for handling internal and external complaints and objections from customers, standard owners, authorities or other third parties has been introduced, which incorporates VLOG certification.
- A documented procedure for handling deviations and suspicious activities with respect to VLOG-certified businesses has been introduced.

- **Crisis management**

- A documented crisis management system has been set up, which incorporates VLOG certification.
- The Crisis Management Officers for VLOG are listed by name.

- **Qualifications of auditors/evaluators/certifiers**

- The staff employed by the certification body must have the qualifications described in Chapter 2.
- The certification body must describe the requirements for qualification as an auditor/evaluator/certifier in its quality management system and in the relevant training and professional qualification documents.
- The certification body must review and confirm the technical qualifications and expertise of the auditors/evaluators/certifiers, and only use qualified and trained staff.
- As part of this review, the certification body must conduct at least one witness audit of auditors in each **qualification area**² stage within five years. This witness audit can also be conducted as part of a combined audit with other quality standards.

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- **Auditor training in the VLOG audit procedure provided by the certification body**

- Participation in an internal VLOG training course
- Participation in a VLOG-approved initial training course
- Before independently conducting VLOG routine audits:
 - **Every Auditor perform at least 2 VLOG audits under the control and guidance of an experienced and qualified VLOG auditor and** ~~At least 2 VLOG routine audits as lead auditor and~~
 - **Attend an experienced and qualified VLOG auditor for** ~~at least 2 VLOG routine audits as co-auditor or attendant~~

changed

¹ The following suspicious activities may constitute grounds for an audit:

- Information from the industry
- Discrepancies noted during certificate monitoring at the business
- Cross-checks
- Current food scandals
- Information from VLOG

² The following 3 qualification areas exist:

Agricultural business, agricultural business group organisation
Logistics (feed), feed manufacturing, matrix certification
Food processing, logistics (food), retail

- These audits must be conducted at the ~~stages~~ **qualification areas** in which the auditor will conduct VLOG audits | changed
 - ~~If the Auditor performs who are to conduct~~ VLOG audits at multiple ~~stages~~ **qualification areas, he** must successfully complete at least 3 VLOG routine audits per ~~stage~~ **qualification area, of which he is supervised and act as lead auditor of** in at least one audit **by an experienced and qualified VLOG auditor.** | changed
 - The certification body must promptly discuss all training audits with the attending auditor, document and evaluate them, and devise any appropriate measures.
 - If new ~~stages~~ **qualifiaction areas** are added, auditors must successfully complete at least 3 VLOG routine audits at the new ~~stage~~ **qualification area, and will be supervised by an experienced and qualified VLOG auditor** ~~act as lead auditor of at least one audit.~~ | changed
 - After training has been completed, the certification body will decide whether the auditor is authorised to conduct VLOG audits independently. This decision must be documented.
- **Evaluator/certifier training on the VLOG audit procedure provided by the certification body**
 - Participation in an internal VLOG training course
 - Participation in a VLOG-approved initial training course
 - After training has been completed, the certification body will decide whether the evaluator/certifier is authorised to evaluate/certify VLOG audits independently. This decision must be documented.

Additional for certifier³:

- Every certifier must attend 5 routine audits in at least one quality standard (e.g., QS, GLOBAL G.A.P, IFS, GMP+, Öko, etc.) before conducting independent VLOG-certifications.

1.1.3 Staff Registration with VLOG

Initial recognition of the certification body:

The certification body must register all VLOG auditors with VLOG (notification sheet) before they conduct independent VLOG audits.

The certification body must register all VLOG evaluators and VLOG certifiers with VLOG (notification sheet) before they independently evaluate/certify VLOG audits.

Maintaining the recognition of the certification body

Following the recognition, the certification body must provide an overview of the personnel (auditors, evaluators and certifiers) to be assigned to VLOG certifications in the following year (notification sheet) by the end of the respective year (i.e. 31 December xxxx).

1.1.4 Contract with Non-Exclusive Auditors

The certification body must sign a contract with all non-exclusive or self-employed auditors, in which auditors agree to the terms of the VLOG Integrity Programme and to inclusion in the penalty procedure.

³ Applies to certifiers who certify VLOG audits for the first time after 01.01.2020.

1.1.5 Four-Eyes Principle

The “four-eyes” principle must be used for audits and certification according to the VLOG Standard. Auditor are not permitted to make final decisions on certification for audits they performed in person.

The certification body must have sufficient staff for evaluating and certifying VLOG audits. Evaluation and certification may be performed by the same person.

1.1.6 Handling of Documents

All documents, including training materials, which prove the qualifications of the certification body's personnel and the auditors must be available at the certification body and provided to VLOG if requested.

The certification body must retain all documents and records documenting the certification decision-making process so they can be submitted to VLOG upon request.

If documents are not available in English or German, they must be conveyed to VLOG in English or German, upon request by VLOG. The translation costs shall be borne by the certification body.

1.1.7 Internal Training

Before participating in VLOG-approved initial training, the relevant auditors, evaluators and certifiers must participate in an internal VLOG training⁴ course provided by the certification body.

The certification body must consistently provide internal VLOG training to all VLOG auditors, evaluators and certifiers at least once a year and on an “as-needed” basis.

The internal training must at least cover the relevant general and stage-specific requirements of the VLOG Standard, the requirements for auditors and certification bodies, the use of the “VLOG geprüft” and “Ohne GenTechnik” seals and the sequence of the VLOG certification process. These topics may also be integrated into other ISO/IEC 17065-based training courses.

The certification body must create a training programme to qualify auditors, evaluators and certifiers and must maintain documentation of their participation in an internal training course. This is the prerequisite for participating in a VLOG-approved external initial or advanced training course.

For auditors, evaluators and certifiers operating in more than one qualification area in the VLOG system and attend stage-specific external VLOG training, the certification body shall ensure that the content of the other relevant stages that are not covered by the external training is communicated to staff.

added

1.1.8 Transmission of Audit Documents to VLOG

The certification body must upload the audit results/audit documents designated in Table 1 to the VLOG ECERT database in German or English, no later than eight weeks after the VLOG audit.

Instructions regarding the VLOG certification body portal, including the annexes, are available at the following link: <https://www.ohnegentechnik.org/anleitungen-ecert/>.

⁴ Training may consist of individual instruction.

Table 1: Overview of the Audit Documents to be Submitted to VLOG

Audit type/Stage	Audit Documents to be Submitted
Individual certification (initial or routine audits)	<ul style="list-style-type: none"> • Current facility description • Completed VLOG checklist(s) • VLOG certificate • Other certification-related documents, if necessary (e.g. list of raw materials or products, summary of traceability etc.)
Group certifications (initial or routine audits)	<ul style="list-style-type: none"> • Current group description • Completed VLOG checklist of group organiser • VLOG certificate • Members list • Upon request by VLOG, the certification body must promptly make available to VLOG the following documents in German or English⁵: <ul style="list-style-type: none"> - audit documents of the group members - Current list of members
Matrix certification: (initial or routine audit)	<ul style="list-style-type: none"> • Current matrix description • Completed VLOG checklist of matrix organiser • VLOG certificate • Site list • Upon request by VLOG, the certification body must promptly make available to VLOG the following documents in German or English⁵: <ul style="list-style-type: none"> - audit documents of the matrix members and matrix sites - Current list of sites
Expansion audit/follow-up audit/audits for cause:	<ul style="list-style-type: none"> • VLOG checklist • VLOG certificate, if applicable • Other certification-related documents, if necessary

1.1.9 Participation in the VLOG Certification Bodies' Meeting

The certification body must participate in the annual VLOG certification bodies' meeting. The certification body delegates a decision-maker (e.g. certifier) to the VLOG certification bodies' meeting.

⁵ The certification body must cover the translation costs.

1.2 Recognition of Certification Bodies

The application for VLOG recognition and the supporting documents must be submitted directly to VLOG in German or English.⁶ VLOG will examine the documents submitted and inform the applying certification body of the result of the examination.

In the event of recognition, VLOG will issue a certification-body-specific VLOG recognition number and include the certification body in the list of VLOG-recognised certification bodies.

Certification bodies that already have VLOG recognition as of 31 December 2019 or that are listed as VLOG recognised certification bodies must receive a new recognition within one year (i.e. by 31 December 2020). The documents identified in Chapter 1.2.3 must be submitted to VLOG to maintain recognition.

1.2.1 Documents to be Submitted for Initial Recognition as of 1 January 2020

The certification body must submit the following documents for initial recognition by VLOG:

- Accreditation certificate in accordance with ISO/IEC 17065 (certified translation⁷ into German or English if the certificate was issued in a different language)
- Application for VLOG recognition of certification bodies (master data sheet)
- Notification sheet for auditors, evaluators and certifiers⁸
- Training certificate indicating successful completion of VLOG-approved VLOG training for at least one auditor and one evaluator/certifier
- Signed Recognition Agreement in duplicate (with the originals sent by regular mail)

1.2.2 Maintenance of Recognition

Recognition of the certification body will be maintained under the following conditions:

- Submission of the current accreditation certificate in accordance with ISO/IEC 17065 on the certification body's own initiative within four weeks of (re-)issuance
- Notification of changes to the master data for the certification body (e.g. contact person) on the certification body's own initiative
- Participation in the annual VLOG certification bodies' meeting
- Submission by the end of the year (i.e., 31 December xxxx) of an overview of the planned VLOG personnel assignments for the following year (auditors, evaluators and certifiers)

1.2.3 Maintenance of Recognition by a Certification Body Already Recognised by VLOG

The certification body must submit the following documents until 31.12.2020 to maintain its recognition if it was already recognised by VLOG as of 31 December 2019:

- Accreditation certificate in accordance with ISO/IEC 17065 (certified translation⁵ into German or English if the certificate was in a different language)
- Application for VLOG recognition of certification bodies (master data sheet)
- Notification sheet for auditors, evaluators and certifiers⁸

⁶ VLOG or the service provider assigned by VLOG will request any missing or incomplete documents/evidence from the applying certification body. If the documents are incomplete after a second follow-up request, the application may be rejected.

⁷ The certification body must cover the translation costs.

⁸ Either one notification sheet per person or an overview of all persons must be submitted as notification of auditors, evaluators and certifiers

- Signed Recognition Agreement in duplicate (with the originals sent by regular mail)

1.2.4 Documents to be Submitted for Renewing Recognition as a Certification Body

The certification body must submit the following documents to renew its recognition by VLOG:

- Accreditation certificate in accordance with ISO/IEC 17065 (certified translation⁹ into German or English if the certificate was issued in a different language)
 - Application for VLOG recognition of certification bodies (master data sheet)
 - Proof of implementation of the corrective measures established by VLOG and the certification body for purposes of recognition renewal
 - Signed Recognition Agreement in duplicate (with the originals sent by regular mail)
 - Additional documents and/or evidence, if necessary
 - Consent to a fee-based integrity audit within six months after recognition renewal
-

2 Auditors, Evaluators and Certifiers

2.1 Requirements for Auditors

2.1.1 General Requirements

- Non-exclusive or self-employed auditors must sign an agreement with the respective certification body in which they agree to the terms of the VLOG Integrity Programme and to inclusion in the penalty procedure.
- Auditors must comply with the audited business's and the certification body's procedures for non-disclosure of information and records.
- Auditors must provide the certification body with all relevant information regarding their qualifications.
- Auditors must comply with the Code of Conduct and the auditing principles of DIN EN ISO 19011.
- Auditors may not conduct audits of businesses, producers or producer groups for which they provided consulting services within the last two years or with which they have and/or had a business, personal and/or family relationship.
- Auditors may not carry out routine audits in the same business on more than three sequential occasions

2.1.2 Training and Professional Experience

The auditors assigned to VLOG certification must have the training or technical qualifications related to agriculture, feed or food as specified in Table 2. Credit may be given for at least 2 years of relevant professional experience at the respective stage or sub-stage, irrespective of the qualifications listed in Table 2. The certification body will decide whether to recognise the professional experience of its personnel and justify its determination in writing.

⁹ The certification body must cover the translation costs.

Table 2: Necessary qualifications for VLOG auditors, evaluators and/or certifiers

Stage/sub-stage Qualification	Logistics		Feed production		Matrix certification	Agriculture		Agricultural group organisation	Food processing/preparation	Retail - Sale of bulk food of animal origin
	Trading, handling, storage, drop shipping, private labelling of feed	Trading, handling, storage, drop shipping of food	Feed production	Mobile grinding and mixing facilities	Matrix organiser	Animal farming and plant-based production	Animal transport/livestock trade	Group organiser	Food processing, preparation	Retail group certification
Graduate engineering /Bachelor's/ Master's degree in agricultural sciences or equivalent	X		X	X	X	X	X	X	X*	
Degree from a two-year agricultural college	X		X	X	X	X	X	X	X*	
Completion of a master craftsman's exam in agriculture	X		X	X	X	X	X	X	X*	
Professional training in an agriculture-related business (including miller, compound feed technician) + special knowledge	X		X	X	X	X	X	X	X*	
Veterinarian + special knowledge		X				X	X	X	X	X
Graduate engineering /Bachelor's/ Master's		X					X	X	X	X

	Logistics		Feed production		Matrix certification	Agriculture		Agricultural group organisation	Food processing/pr eparation	Retail - Sale of bulk food of animal origin
Stage/sub-stage Qualification	Trading, handling, storage, drop shipping, private labelling of feed	Trading, handling, storage, drop shipping of food	Feed production	Mobile grinding and mixing facilities	Matrix organiser	Animal farming and plant-based production	Animal transport/livestock trade	Group organiser	Food processing, preparation	Retail group certification
degree in food technology/chemistry, food technologist										
Graduate engineering /Bachelor's/ Master's degree (univ./college) in ecotrophology		X					X	X	X	X
Graduate engineering /Bachelor's/ Master's degree in biology (+ special knowledge of each area)						X	X	X		
Professional training in the food processing industry		X					X	X	X	X

X*exclusively includes auditing, evaluation and certification of packing centres for eggs

added

2.1.3 Auditing Experience

For Initial Recognition:

Auditors must have conducted at least 10 complete audits in at least one quality standard accredited under ISO/IEC 17065 (e.g., QS, GLOBAL G.A.P, IFS, GMP+, Öko, etc.) in the past two years at various businesses/facilities for each reported ~~stage~~ **qualification area** (agricultural business/agricultural business group organisation, logistics (feed)/feed manufacturing/matrix certification, logistics (food)/food production/retail). Auditors must have acted as lead auditor or co-auditor in at least five of these audits. Training audits according to 1.1.2 can be taken into account here.

added
changed

For Maintenance of Recognition

VLOG auditors must successfully complete at least 5 VLOG routine audits per year in the **qualification area** agricultural business/**agricultural group organisation** ~~stage~~ during the VLOG training certificate's period of validity (Note: This also includes QA audits with the VLOG supplementary module).

added
changed

During the VLOG training certificate's period of validity, VLOG auditors must successfully complete at least 3 VLOG routine audits, respectively, in the **qualification area** logistics (feed)/feed manufacturing/matrix certification,, logistics (food)/ food production/processing/retail ~~stages~~ at various facilities¹⁰ (Note: This also includes QA audits with the VLOG supplementary module).

Changed
added
footer

2.1.4 Training on the VLOG Auditing Procedure by the Certification Body

The certification body has to train auditors on the VLOG auditing procedure in accordance with Chapter 1.1.2.

2.1.5 Training

Auditors must hold a valid VLOG training certificate (cf. VLOG training concept).

If an auditor operates in the VLOG system in more than one qualification area (e.g. agriculture and feed production and attends a stage-specific external VLOG training (e.g. agriculture), the auditor receives the contents of the other relevant qualification areas that are not part of the external training (e.g. feed production) from the certification body.

added

Before participating in a VLOG-approved initial training course, auditors must participate in an internal VLOG training course provided by the certification body (cf. Chapter 1.1.7).

The auditor must participate in an internal VLOG training course provided by the certification body at least once per year (cf. Chapter1.1.7).

2.2 Requirements for Evaluators/Certifiers

The following requirements apply to certification body personnel who carry out the evaluation of auditing documents and/or make certification decisions.

¹⁰ For certification bodies that have less than 3 VLOG certified companies per qualification area contracted, the required audits do not have to be carried out at different companies.

2.2.1 General Requirements

- Evaluators/certifiers must comply with the audited business's and the certification body's procedures for the confidential treatment of information and records.
- Evaluators/certifiers must comply with the Code of Conduct and the auditing principles of DIN EN ISO 19011.
- Evaluators/certifiers may not evaluate/certify businesses, producers or producer groups for which they provided consulting services within the last two years or with which they have and/or had a business, personal and/or family relationship.

2.2.2 Training and Professional Experience

Evaluators/certifiers assigned to VLOG certification must have the training or technical qualifications related to agriculture, feed or food specified in Table 2.

Credit may be given for at least 2 years of relevant professional experience at the respective stage or sub-stage, irrespective of the qualifications listed in Table 2. The certification body will decide whether to recognise the professional experience of its personnel and justify its determination in writing.

added

2.2.3 Training in the VLOG Auditing Procedure by the Certification Body

The certification body must train evaluators/certifiers in the VLOG auditing procedure in accordance with Chapter 1.1.2.

2.2.4 Training

Evaluators/certifiers must hold a valid VLOG training certificate (cf. VLOG training concept).

If an evaluator/ certifier is in the VLOG system for in more than one qualification area (e.g. agriculture and feed production) and attends a stage-specific external VLOG training (e.g. agriculture), the auditor receives the contents of the other relevant qualification areas that are not part of the external training (e.g. feed production) from the certification body.

added

Before participating in a VLOG-approved initial training course, evaluators/certifiers must participate in an internal VLOG training course provided by the certification body (cf. Chapter 1.1.7).

The evaluator/certifier must participate in an internal VLOG training course provided by the certification body at least once per year (cf. Chapter 1.1.7).

2.3 Registration of Auditors, Evaluators and Certifiers

Certification bodies must register their personnel directly with VLOG in accordance with Chapter 1.1.3 and 1.2. VLOG will check the submitted documents for completeness and inform the relevant certification body of the results of its examination. In case of the initial recognition of a certification body, all auditors/evaluators/certifiers must be registered with VLOG before they can be assigned tasks in the VLOG system.

In addition to the notification sheet, certification bodies must submit the following documents at the request of VLOG or have them inspected by VLOG during VLOG Integrity audits:

- CV of auditor/evaluator or certifier

- Proof of technical qualifications/professional training
- Proof of internal VLOG training course(s)

Additional documentation for auditors:

- List of audits¹¹ (list of at least 10 audits in at least one recognised quality standard (e.g., QS, GLOBAL G.A.P, IFS, GMP+, Öko, etc.) within the last two years)
- Proof of training in the VLOG auditing procedure (List of all VLOG co-audits and lead audits¹²)
- List¹² of all successfully completed VLOG audits

Additional documentation for evaluators/certifiers:

- Proof(s) of internal VLOG training course(s)
- Proof of training in the VLOG auditing procedure (List¹² of all VLOG co-audits)

3 Fees

The recognition of a certification body and the maintenance thereof in accordance is subject to fees in accordance with the VLOG Fee Schedule.

The recognition fee is payable even if the application is rejected.

4 Applicable Documents

- Current version of the “Ohne Gentechnik” Production and Certification Standard
- VLOG training programme in the current version
- Recognition Agreement
- Application for VLOG recognition of certification bodies in the version valid at the time
- Notification sheet for auditors, evaluators and certifiers in the version valid at the time
- VLOG Guideline for dealing with breaches in the version valid at the time¹³
- VLOG Fee Schedule for membership and VLOG recognised businesses in the current version

5 Glossary

All terms not defined in this Guideline have the same meanings as in the Glossary for the “Ohne Gentechnik” Production and Certification Standard.

Co-auditor: auditor who does not perform the lead function in the audit or who acts as an observer.

~~**Lead auditor:** auditor who performs the lead function in the audit (audit leader).~~

deleted

Non-exclusive auditor: VLOG auditor who works for more than one VLOG-recognised certification body.

Witness audit: audit in which the auditor is monitored by the relevant VLOG-recognised certification body.

¹¹ Must at a minimum include the following information on the audited business: name, address, site and site address, if applicable, audit date and quality stage

¹² Must at a minimum include the following information on the audited business: name, address, site and site address, if applicable, audit date and VLOG stage

¹³ Currently being edited and will soon be published.

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**Fees for membership in the
“Verband Lebensmittel ohne Gentechnik e.V.” and for
VLOG-recognised companies**

Effective as of 1 July 2018

The fee for full membership follows from the following categories and – for companies – also depending on their size.

- Agriculture
- Feed
- Processing/Retail
- Certification/laboratory
- Other

The fixed membership fees may not be suitable in individual cases. In exceptional cases, the Board can decide to waive the obligation to pay fees, in whole or in part, upon written request. There is no legal entitlement to reduction of the membership fee or to be released from the obligation to pay fees. Any reduced fee must be applied for in writing and justified by means of relevant documents. The Board decides once all documents have been submitted. Exceptions in this regard are, for example, short-term economic shortfalls of a company that has been a member or licensee for many years.

When such an exception is granted, it is always temporary; however, it can be extended by the Board upon renewed request.

Being a member of the Verband Lebensmittel ohne Gentechnik does not entitle you to use the “Ohne GenTechnik” or “VLOG geprüft” seal. That will require a licence to be issued and a licensing fee to be paid.

Membership fees are not subject to VAT.

1. Membership fee per year in euros, based on the yearly total sales in euros

Breakdown for agriculture ¹	Category	1	2	3	4	5	6
	Total sales in million euros	< 1	> 1 < 5	> 5 < 50	> 50 < 100	> 100 < 200	> 200
	Fee in euros	30	30	60	90	120	To be agreed

Breakdown for processing ² / Retail	Category	1	2	3	4	5	6	7
	Total sales in million euros	< 5	> 5 < 200	> 200 < 600	> 600 < 1,000	> 1,000 < 5,000	> 5,000 < 10,000	> 10,000
	Fee in euros	30	120	240	350	590	940	To be agreed

Breakdown for feed	Category	1	2	3	4	5	6
	Total sales in million euros	< 5	> 5 < 100	> 100 < 200	> 200 < 500	> 500 < 1,000	> 1,000
	Fee in euros	30	60	90	120	240	To be agreed

¹ Including farm shops, farm cheese dairies, and apiaries

² Including butchers and bakeries

Certifiers, Laboratories	Flat rate of 800 euros As of 01 January 2019, flat rate of 100 euros
Other	As per agreement minimum 30 euros

2. Fees from VLOG-recognised companies; Recognition and amounts per year in euros

	Initial recognition (Fee in euros)	Fee for the following year (Fee in euros)
Laboratory	1000	1000
Laboratories (Outsourcing)³	300	300

	Initial recognition (Fee in euros)	Fee for the following year (Fee in euros)
Certification body⁴	700	700

³ Subcontracting is deemed to occur if orders for GMO assessments are exclusively contracted out to other laboratories.

⁴ Effective as of 1 January 2019

“Ohne Gentechnik” Production and Certification Standard

Version 20.01

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Obligatory as of 1 January 2020



Verband Lebensmittel ohne Gentechnik e.V.
www.ohnegentechnik.org

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A 1 Introduction

The German EC Genetic Engineering Implementation Act (EGGenTDurchfG) has been in force since May 2008. 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 1.1 Purpose of the Standard

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.

This Standard serves as the basis for issuance by VLOG of a licence to use the "Ohne GenTechnik" and "VLOG geprüft" seals. Moreover, it assists businesses in developing a risk management system.

The present Standard is intended for

- Producers, processors and traders of food who wish to label their products with an "Ohne GenTechnik" seal or the designation "ohne Gentechnik"/"VLOG".
- Feed manufacturers and traders who wish to label their products with the "VLOG geprüft" seal or the designation "VLOG geprüft".

In addition to agricultural operations and logistics companies, certification under this Standard can also be extended to food producers and processors and feed manufacturers, separate from the aforementioned product labelling option ("Ohne GenTechnik" seal/"VLOG geprüft" seal).

A 1.2 VLOG as Standard-Issuing Body

The legal basis for the "ohne Gentechnik" label is the EC Genetic Engineering Implementation Act (EGGenTDurchfG). In response to the desire of interested businesses and associations for improved recognition of food without GMO, the German federal government developed the unitary "Ohne GenTechnik" seal.

Since the federal government did not want to issue the usage licenses itself and preferred to have them issued by a food sector association, on 23 March 2010, a working group of interested companies formally established the German Association Food without Genetic Engineering (VLOG) from among its members.

VLOG represents the interests of its members vis-a-vis regulators, government, media, society at large and also other market participants. Its members include, among others, farmers, businesses of the food and feed industry, certification bodies, laboratories and food retailers.

A 1.2.1 Use of the "Ohne GenTechnik" Seal

Since August 2009 food may be labelled with the nationwide "Ohne GenTechnik" seal (see Figure 1), which is a registered trademark owned by the Federal Republic of Germany.) On the basis of an exclusive agreement with the Federal Ministry of Nutrition and Agriculture, VLOG is solely authorised to issue usage rights for the "Ohne GenTechnik" seal. Therefore, the use of the "Ohne GenTechnik" seal for labelling and advertising food as well as for the use on certificates is only permissible with the approval of VLOG. The specific usage is governed by a licence agreement between each licensee and VLOG. The basis for this agreement is certification of compliance with the present Standard or a standard recognised as its equivalent.



Figure 1: Seal for food certified in accordance with the VLOG Standard

Use of the “Ohne GenTechnik” seal outside of Germany

To use the German, or a translated version, of the “Ohne GenTechnik” seal, the requirements of the VLOG Standard must be met along with those pursuant to the national law of the country where the product is being placed on the market. Assessing the legality of using the “Ohne GenTechnik” seal outside of Germany is the sole responsibility of the licensee.

A suitable translation of the “Ohne GenTechnik” seal may be requested from VLOG. It is not permitted to develop one's own translated version. Products may only be placed on the market with a translated version of the seal following conclusion of a sub-licensing agreement between the licensee and VLOG. If such an agreement already exists, it must be supplemented with any new products that are to be labelled.

A 1.2.2 Use of the “VLOG geprüft” Seal for Feed

In order to explicitly point out on the package and/or the bill of lading accompanying a 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 their suitability for “ohne Gentechnik” food production, the trademarked “VLOG geprüft” seal (see Figure 2) may be used. The use of the “VLOG geprüft” seal is only permissible with the consent of VLOG as the proprietor of the trademark, and is regulated by a separate License-Agreement between VLOG and the business placing the product in the market. The basis for this agreement is certification of compliance with the present Standard or a standard recognised as its equivalent.

The English version of the seal reads: “VLOG verified”. No other translations are permitted.



Figure 2: Seal for feed certified in accordance with the VLOG Standard

A 1.3 Legal Basis & Interpretation

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

- EC Genetic Engineering Implementation Act (Gesetz zur Durchführung der Verordnungen der Europäischen Gemeinschaft auf dem Gebiet der Gentechnik und über die Kennzeichnung ohne Anwendung gentechnischer Verfahren hergestellter Lebensmittel, EG-GentechnikDurchführungsgesetz, abbreviated EGGenTDurchfG), dated 22 June 2004 (Federal Law Gazette I p. 1244, last amended by Article 58 of Regulation of 31 August 2015, Federal Law Gazette I p. 1474)
- Regulation (EC) No. 1829/2003 concerning genetically modified food and feed, dated 22 September 2003
- Regulation (EC) No. 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms, dated 22 September 2003 and the amendment to Directive 2001/18/EC
- Regulation (EC) No. 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down the procedures in matters of food safety, Article 18 (1), dated 28 January 2002
- Regulation (EC) No. 619/2011 laying down the methods of sampling and testing for the official control of feed for genetically modified material for which an approval procedure is pending or the approval of which has expired, dated 24 June 2011
- Regulation (EC) No. 834/2007 of the European Council on organic production and labelling of organic products and repealing Regulation (EEC) No. 2092/91, dated 28 June 2007
- Regulation (EC) No. 152/2009 of the European Commission laying down the methods for sampling and analyses for the official testing of feed, dated 27 January 2009
- Regulation (EU) No. 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No. 1924/2006 and (EC) No. 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No. 608/2004
- Directive 2001/18/EC of 12 March 2001 on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC

The following interpretations can provide assistance in implementing the VLOG Standard:

- Guidelines for controlling GMOs in feed – monitoring of the production, handling, use and placing on the market of feed in connection with genetically modified organisms, dated November 2011 (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 Federal Government and The Association of German Agricultural Investigation and Research Institutions (VDLUFA), especially Chapter 5 as well as Annexes 1 and 2)
- Guidelines for controlling genetic modifications in food products – orientation framework for applying the legal regulations and for controlling genetic modifications in food products of 29 March 2017 (developed by the ALS working group Monitoring of GMO Food Products)
- Additional interpretations of the legal regulations by the VLOG managing office may be found at: <https://www.ohnegentechnik.org/faq> and <http://www.ohnegentechnik.org/downloads/>

A 1.3.1 Regulations (EC) No. 1829/2003 and 1830/2003

A basic requirement regarding feed and food ingredients for the production of food labelled “ohne Gentechnik” is that they be exempt from labelling according to the requirements of Regulations (EC) No. 1829/2003 and No. 1830/2003.

Contamination with GMOs permitted in the EU by law are exempt from labelling obligations according to Regulations (EC) No. 1829/2003 and No. 1830/2003 if the following two requirements are fulfilled:

- The threshold value of the GMO content of 0.9% per feed material/ingredient (feed/food) is not exceeded and
- The presence of the GMO content is “adventitious or technically unavoidable”.

Contamination with approved GMO content < 0.1% is generally considered as “technically unavoidable” or “adventitious”.

Contamination present in a magnitude of > 0.1% and ≤ 0.9% is considered as labelling-compliant if the business has installed and demonstrably implemented organisational measures to avoid introduction of GMO material.

Assistance for labelling feed

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 “Guideline on controlling GMOs in feed” (http://www.ohnegentechnik.org/Leitfaden_Futtermittel).

With regard to Example 4.b 1 in Annex 1 of the abovementioned Guideline, it is explicitly noted that the waiver of the GMO marking relates only to botanical contamination of a feed material. Carryover of GMO material during the production process in a feed plant may not be considered as botanical contamination with the resulting labelling requirements.

A 1.3.2 EC Genetic Engineering Implementation Act (EGGenTDurchfG)

Any business that meets the statutory prerequisites 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. If, however, it is intended to use the unitary “Ohne GenTechnik” seal (Figure 1), an application in this regard must be submitted to VLOG in advance (see Chapter A 1.2.1).

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

According to EGGenTDurchfG, in the production of “ohne Gentechnik” food, no GMO ingredients and additives may be used, nor may they contain or be produced from 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. Processing aids may not be produced by GMOs.

In cases where necessary additives such as vitamins are demonstrably not available in the market in “ohne Gentechnik” quality, additives produced by GMOs may be used. Prerequisite for this exception is that these substances be listed by the EU Commission according to the procedure provided by Regulation (EC) No. 834/2007.

Feed for use in the “ohne Gentechnik” system must not be subject to compulsory labelling pursuant to Regulation (EC) No. 1829/2003 or 1830/2003. Appropriate steps are demonstrably undertaken to avoid and prevent the presence of any genetically modified material (see “Guideline for the Control of GMOs in feed”). Feed additives must be taken into consideration only if they are made from GMOs or GMO components and therefore must be labelled 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 1.4 Additional Requirements for Processing Aids and other Substances

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 2 Scope of Applicability of the Standard

The present Standard forms the basis for certification for the stages mentioned in A 2.1 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. For use of the VLOG Standard outside the EU, the business or certification body must apply to VLOG for permission before certification.

A 2.1 Definition of Stages in the Standard

The stages and sub-stages in the production chain for which the VLOG Standard lays down requirements are defined below. The regulations regarding the certification obligation may be found at the beginning of Parts B to H of the Standard.

If a business is applying for certification according to the VLOG Standard for activities in multiple stages and/or sub-stages, all the requirements for the respective stages/sub-stages must be checked by the auditor.

Definition of stages, including the relevant parts of the Standard:

- Logistics (Part B)
 - Transport of feed/food
 - Storage, handling of feed/food
 - Trade, drop shipping of feed/food
 - if applicable, including conversion of feed material to “VLOG geprüft”
 - Private Labelling¹

(Animal transport and livestock trade → is assigned to the Agriculture stage (Part E))

- Feed manufacturing (Part C)
 - Feed manufacturing/processing
 - Mobile grinding and mixing facilities

(Transport, storage, handling and trading of feed → is assigned to the Logistics stage (Part B))

- Matrix certification (Part D)
 - Feed manufacturing/processing
 - Mobile grinding and mixing facilities

¹ For definition see Glossary

- Transport of feed/food
- Storage, handling of feed/food
- Trade, drop shipping of feed/food
 - if applicable, including conversion of feed material to “VLOG geprüft”
- Agriculture (Part E)
 - Animal production
 - Plant-based production
 - Animal transport, livestock trade
- Group organisation Agriculture (Part F)
- Food processing / preparation (Part G)

(Transport, storage/handling and trading of feed → is assigned to the Logistics stage (Part B))
- Retail – Sale of bulk food of animal origin (Part H)

A 3 Certification Types and Certification Process

A 3.1 Audit Types

The VLOG Standard differentiates amongst the following audit types which are valid for all stages:

Initial audit:

During the initial audit, a business will be audited one first time in accordance with the “Ohne Gentechnik” Production and Certification Standard. It is a full on-site audit of all sites/business units involved in “ohne Gentechnik”/“VLOG geprüft” activities of a 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 requirements are met.

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

- Logistics stage, feed manufacturing, group organiser, matrix organiser, food processing / preparation, retail - sale of bulk animal food products:
The audit is to take place during production but not necessarily during the production of “ohne Gentechnik” and/or “VLOG geprüft” products. 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.

Reduced initial audit for feed producers and/or feed logistics providers:

If the business is certified according to a recognised quality assurance standard such as QS, KAT or GMP+, initial certification may be awarded on the basis of a reduced initial VLOG audit. This is permissible if a routine audit according to the quality assurance standard was carried out and passed within the last 6 months, at most. In the reduced initial VLOG audit, only those requirements related to genetic engineering audit points will be assessed. Unassessed requirements will be marked as such in the VLOG checklist and reference will be made to the items and results of the routine quality

assurance audit. The report from the routine audit according to the other quality assurance standard will be sent to VLOG along with the VLOG certification documents.

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 determined by the relevant certification body.

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

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 on-site. 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.

Routine audit (to renew certification):

The routine audit is a full on-site audit of all sites/business units involved in “ohne Gentechnik”/“VLOG geprüft” activities of the business. All requirements of the present Standard will be assessed by the auditor. If the requirements of the VLOG Standard are met, the business will be recertified.

Each business is responsible for updating the certification/having the routine audit performed. The audit takes place during VLOG-compliant activity and/or production of “Ohne Gentechnik” and/or “VLOG geprüft” products. The routine audit is usually announced beforehand.

The audit interval requirements are set forth in Chapters, B 2.2, C 2.1, D 2.3, E 2.2, F 2.4, G 2.2 and H 1.

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.

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 documents must be fully completed.

A 3.2 Types of Certification

With regard to VLOG certification of businesses, the Standard differentiates between

- Individual certification of businesses: For the requirements and procedure of individual certification see Chapter A 3.2.2 et seq.
- Matrix certification for logistics and feed manufacturing (for associated sites in the areas of logistics and feed manufacturing): For requirements and procedure see Chapter D 2.1.

- Group certification in agriculture (for associated agricultural operations): For requirements and procedure see Chapter F 2
- Group certification in retail (for associated branch operations): For requirements and procedure see Chapter H 2

A 3.2.1 Commissioning External Service Providers

If the business outsources activities subject to certification to external service providers (“contractors”), the contractors must undergo an on-site audit according to the VLOG Standard.

The basis for the audit is

- either a written contractual agreement between the client and contractor, or
- an independent certification application filed by the contractor with a VLOG-recognised certification body.

If the audit is performed on the basis of the contractual agreement between the client and contractor, the scope of the auditor's on-site assessment is limited to assessing the contractor's production for compliance with the requirements of the VLOG Standard.

The audit interval for the contractor depends on the VLOG-stage of the contractor (see chapter A 2.1). The contractor does not receive a VLOG certificate. As a minimum requirement, the agreement between the client and contractor must contain the details of the outsourced activity, its scope as well as the contractor's obligation to comply with the current VLOG Standard.

If the audit is performed based on an independent certification application submitted by the contractor, all VLOG commissions (potentially from a range of clients) are to be audited at the contractor's site. The contractor will receive its own VLOG certificate for the services rendered.

A 3.2.2 Requirements for Individual Certification²

The following requirements must be met at the beginning of the auditing process:

- Signed contract with a VLOG-recognised certification body
- Signed Standard Usage Agreement³ with VLOG

A 3.3 Applying for Certification

The business applies for certification with a VLOG-recognised certification body and specifies the desired scope of applicability for certification (stage/sub-stage/product group). The business and the VLOG-recognised certification body enter into a written agreement regarding performance of neutral audits and certification according to the VLOG Standard.

A 3.4 Scope of Applicability/Certification

The business is to request the area of application desired for certification, which is then audited and confirmed in the certificate. Areas of application may include animal types or categories, products, or {§1} services (e.g. “trade in xy (product group)”, “packaging of eggs”). Products are to be listed on the certificate in product groups.

² Requirements for Group-and Matrix Certification see chapter D 2.1, F 2.1, H 2.1

³ Known as “Certification Agreement” until 20 June 2017. A Standard Usage Agreement signed by VLOG must be in place prior to the issuance of the certificate.

The scope of applicability listed on the VLOG certificate is defined in accordance with Annex XII.

- If the scope of applicability relates to the production, packaging, or trading with eggs, the print numbers of the eggs for which the certificate applies must be included in an appendix to the certificate.
- If the scope of applicability concerns the Feed Stage, Mobile Grinding and Mixing Facilities Sub-stage, then the license plates of the mobile grinding and mixing facilities to be audited within the scope of the VLOG certification will be listed in the scope of applicability of the VLOG certificate.

If new product groups, processes, etc. are to be included within the scope of applicability, the certification body will decide whether this must be done through an expansion audit or on the basis of previously submitted documents (see Chapter A 3.1).

A 3.5 Risk Grading of Businesses

The VLOG Standard follows a risk-based approach for the evaluation of processes and monitoring in the business. This is done through risk grading of the business. The risk grading serves to identify and estimate potential sources of introduction and risk of carryover of GMOs as well as any risk of commingling and confusion with non-compliant products in the business. With this in mind, the auditor⁴ will evaluate the organisation as well as the physical and temporal processes in the entire business. The use of GMOs and non-compliant raw materials and/or feed in the business will result in a higher risk grading.

- Businesses in the Logistics, Agriculture and Food Processing / Preparation Stages will be graded by the auditor and certification body into risk categories as per the criteria in Chapters B 2.1, E 2.1 and G 2.1 based on risks.
- In the area of feed, grading into risk categories will be based on the production system of the “VLOG geprüft” production (e.g. dual or solely exempt from mandatory labelling).
- In retail, the organisation of purchasing (centralised or decentralised) is relevant for risk grading.

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 before the audit; it is assessed and, if necessary, redefined by the auditor in every audit. The definition is to be documented or modified as needed in the facility description and in the checklist.

A 3.6 Planning of Audits

In the case of announced audits

- the audit date/time and expected duration thereof as well as
- the scope of the audit

are to be determined jointly by the auditor/certification body and the business. The auditor/certification body must draw up an audit plan.

⁴ Or group organizer, in the case of group certifications

A 3.7 Performance of the Audit

The on-site audit is to be organised as follows:

Introductory meeting:

- Introduction of the auditor and the persons involved
- Explanation of the planned audit schedule
- Clarification of fundamental questions regarding the audit schedule

Following the document and facility inspection (sequence to be defined by the auditor):

Document inspection:

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

Facility inspection:

- On-site assessment of the production areas, facilities and relevant production processes
- Verification of compliance with the system requirements (e.g. segregated handling, awareness of the risk of introduction and carryover of GMOs, etc.)
- Interview of staff
- Sampling as provided for and/or in the case of suspected non-compliance

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, visual inspection and comparison of documents). The selection is performed in a risk-based manner. If the business only uses one facility for “VLOG geprüft” production, then this facility is to be inspected.
- Stationary grinding and mixing facilities: The inspection includes all facilities associated with the agricultural operation.

Final discussion:

- Summary of findings/deviations and preliminary result

Corrective actions may be agreed in the final meeting and established in writing. This will not affect the audit results.

If corrective actions are determined and agreed at the latest 4 weeks after the audit (see A 3.9.1), this must also be documented in writing and before the certificate is issued.

The auditor is authorised to take additional samples and/or carry out other GMO tests in accordance with risks or in suspicious cases.

A 3.8 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 end of the audit, the completed VLOG checklist(s) are signed by the auditor and the business.

A 3.9 Evaluation of Requirements

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

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

Grading	Description	Points
A	Full compliance with a requirement	10 points
B	Minor to moderate deviations from the requirement	5 points
C	Non-compliance or major deviation from the requirement	- 10 points
N.A.	Not applicable	-
Risk	Major deviation, meaning that a risk to "ohne Gentechnik"/"VLOG geprüft" labelling cannot be ruled out	- 15% of total points ⁵
KO	Requirements with a critical impact on "ohne Gentechnik/VLOG geprüft" labelling in case of failure to comply	Audit not passed

Table 1: Evaluation of requirements

A "risk" grade may be assigned to all requirement items not defined as KO requirements.

Risk grading is assigned to all deviations that endanger the safety of the "ohne Gentechnik" system, for example, sampling and testing plan not adequately implemented.

KO requirements may only be assigned an A, B, or KO grade. They are listed in the respective chapters of the stages and marked accordingly in the checklists.

If an auditor reaches the conclusion that a particular requirement is not applicable to the business, this requirement may be assessed as N.A. (= not applicable). A KO requirement may not be graded N.A.

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

A 3.9.1 Determination and Handling of Corrective Actions

Procedure:

- The business must determine in writing corrective actions for all deviations identified (B and C grading, as well as Risk and KO grading) and the deadlines for their implementation.
- Corrective actions and deadlines must be presented by the audited business within 4 weeks after the audit and are to be approved by the competent certification body.

⁵ 15% of the points total will be deducted for each criterion classified as a risk.

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

Monitoring of the implementation of the corrective actions lies within the scope of responsibility of the certification body; the statements (see Chapter A 3.9.2) and/or catalogue of sanctions per Annex X apply if the business is sanctioned and/or in connection with corrective actions.



Explanation: Corrective actions and deadlines may be agreed in the final meeting and documented in writing.

A 3.9.2 Audit Evaluation and Certification Conditions

The calculation of the audit result is based on the points specified in Chapter A 3.9.

Audit results	Status	Certificate, measures
<ul style="list-style-type: none"> more than 75% of the maximum points no KO grading 	passed	<ul style="list-style-type: none"> certificate
<ul style="list-style-type: none"> more than 75% of the maximum points no KO grading one risk grading 	passed/not passed	<ul style="list-style-type: none"> decision of the certification body about suspending the certificate, depending on the severity and relevance of the risk of deviation VLOG certificate will not be issued until corrective actions have been implemented and reviewed certification body decides whether a follow-up audit is necessary
<ul style="list-style-type: none"> less than 75% of the maximum points no KO grading 	not passed	<ul style="list-style-type: none"> no certificate the certification body notifies VLOG within 2 working days about failure to pass audit a new routine audit must be performed
<ul style="list-style-type: none"> one or more KO gradings 	not passed	<ul style="list-style-type: none"> no certificate or, for group members, no inclusion in the certification of the group organiser certification body must suspend the current VLOG certificate within 2 working days certification body notifies VLOG about the KO grading within 2 working days (does not apply to audit of group members who did not pass)

Audit results	Status	Certificate, measures
		<ul style="list-style-type: none"> the business must implement the required corrective actions before the certificate is re-issued a new routine audit must be performed

Table 2: Audit Evaluation and Certificate Issuance

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” and/or “VLOG geprüft” seal from licensees.

A 3.10 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. In this regard – if relevant for the respective stage – the risk grading is also to be reviewed by the certification body and corrected, if appropriate. If the risk grading is corrected, the business must be notified as soon as possible.

The certification body is entitled to perform follow-up audits, audits on suspicion and additional checks (see Part H).

A 3.11 Certificate Issuance

A 3.11.1 Requirements for Certificate Issuance

VLOG will only accept certificates according to the VLOG Standard from certification bodies that have concluded a Recognition Agreement with VLOG.

No later than 8 weeks after passing an audit and taking into consideration Chapter A 3.9.2, the certification body will issue the business with a certificate according to the VLOG Standard no later than 8 weeks after the audit⁶. If the certificate is not issued within 8 weeks after the audit, a new routine audit is performed.

Businesses or facilities undergoing initial certification are authorised to start shipping only after the issuance of the certificate.

A 3.11.2 Requirements for VLOG Certificates

VLOG certificates will be issued according to Annex XI. Layout deviations are not permissible without approval by VLOG. The scope of application of the certificate must be formulated pursuant to Chapter A 3.4.

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

⁶ 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 audit occurs later)
- for the follow-up certification: from the audit of the group/matrix organiser

- The annex must contain a reference to the certificate, including specification of the unique certificate identification number.
- The complete name of the certified business must be listed in the annex.
- The annex must be assigned a unique identifier.
- The certificate must contain a reference to the annex, including specification of this unique identifier.

A 3.11.3 Validity Period of the VLOG Certificate

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).

A 3.11.4 Transferring Certification in the Event of Change of 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/change of business name occurs at a VLOG-certified business/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 and the information regarding change of ownership/change of business name to VLOG as soon as possible.

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

For group certifications, the following additional rule applies: The risk categories and audit intervals of the group members will remain in effect.

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 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 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.
4. 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.
5. 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-/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 (see Chapters F 2.2.2 and F 2.2.3 but triggers a follow-up certification (see Chapter F 2.4.

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 certification.

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.
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 certification 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.

The risk categories and audit intervals of the group member/matrix site will remain in effect. The change of a group/matrix does not result in a repeated initial certification, but triggers a follow-up certification.

A 4 Integrity Programme

The Integrity Programme comprises various measures intended to ensure the quality and correct implementation of the VLOG Standard. The selection is performed, among others, in a risk-based manner or by reason of complaints. Compliance with Standard requirements is verified as part of onsite inspections of Standard participants. The Integrity Programme also includes a review of certification bodies and auditors. VLOG or a third party commissioned by VLOG will perform inspections, including sampling, if applicable, within the scope of "Integrity Audits" at the sites of licensees and VLOG-certified businesses. The inspections may be performed in all areas of the business that are relevant to "Ohne Gentechnik" and/or "VLOG geprüft" production as well as at any transport, pre-processing, processing or packaging operations involved in the auditing and certification process, if applicable.

Furthermore, inspections may also be carried out in businesses that are contractually integrated into the "Ohne Gentechnik" system of a group organiser within the scope of group or matrix certification pursuant to the VLOG Standard. Monitoring of the Integrity Programme is to be coordinated with the business involved.

Inspections may be performed with and without advance notice.

A 5 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.

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The section below describes the specific rules and 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).

B 1 Stage Definition and Mandatory Certification

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Transport: Transport means conveying goods from one place to another.			
Feed/Food	<p>For transport of bulk “VLOG geprüft” feed and/or bulk VLOG-certified food/ingredients between VLOG-certified businesses, provided that at least one of the following statements is accurate:</p> <ul style="list-style-type: none"> Transport is <u>not</u> integrated into the risk management of a VLOG-certified business. <u>No</u> agreement regarding compliance with the logistics requirements of the VLOG Standard was concluded between the carrier and the certified business. 	<p>For the transport of bulk “VLOG geprüft” feed and/or bulk VLOG-certified food (ingredients) between VLOG-certified businesses, provided that all of the following three statements are accurate:</p> <ul style="list-style-type: none"> Order placed by a VLOG-certified business Transport is integrated into the risk management of a VLOG-certified business. There is adequate proof of integration. An agreement on compliance with the logistics requirements of the VLOG Standard is in effect between the carrier and the certified business. 	B 1-B 3
		<p>For the transport of bulk “VLOG geprüft” feed between VLOG-certified businesses, provided that the carrier is certified according to GMP+, QS or FCA (OVOCOM), EFISC-GTP, AIC, Qualimat or AMA/pastus+.</p>	B 1-B 3
		<p>For transport of bagged/tamper-resistant packaged “VLOG geprüft” feed and/or VLOG-certified food.</p>	B 1-B 3

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
		For transport of bulk VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of commingling or tampering.	B 1-B 3
Storage/handling: The service of temporary storage of food and/or feed on behalf of a third party or storage in the business' own external warehouses. Handling comprises all activities directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).			
Feed	For storage/handling of bulk “VLOG geprüft” feed	For storage/handling of bagged/tamper resistant packaged feed	B 1-B 4
Food	For transport of bulk VLOG-certified food/ingredients of animal origin, provided they are clearly labelled and there is no risk of commingling 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 commingling or tampering.	B 1-B 4
Trading: Trading comprises all activities within the scope of selling and reselling goods that are not produced at one's own facilities. In contrast to drop shipping, the trader takes physical possession of the goods. That means the trader takes responsibility for storage, handling and/or transport in addition to trading (buying/selling).			
Feed	<p>For traders that want to label bulk feed that is already VLOG-certified as “VLOG geprüft”* on the bills of lading.</p> <p>For traders that want to convert not VLOG- certified feed material into “VLOG geprüft” quality and label it as such*.</p> <p>For traders that sack and label bulk “VLOG geprüft”* feed, and that also want to designate it as “VLOG geprüft” on labels, declarations or bills of lading.</p>	For trading of bagged/tamper resistant packaged feed (except for private labelling).	<p>B 1-B 3, B 5, J 1</p> <p>B 1-B 3, B 5 or B 6, B 7, J 1</p> <p>B 1-B 3, B 5, J 1</p>

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Food	<p>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 commingling or tampering.</p> <p>For the sealed trade of VLOG-certified food between two VLOG-certified businesses, provided that:</p> <ul style="list-style-type: none"> • The trader issues delivery slips of its own for certified goods with the “VLOG” label and/or • The trader commissions non-VLOG- certified carriers or the transport site is <u>not</u> included in the risk management of a VLOG-certified business 	<p>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 commingling or tampering.</p> <p>For trading of sealed VLOG-certified food between two VLOG-certified businesses, provided that all of the following conditions are met:</p> <ul style="list-style-type: none"> • The goods are certified in accordance with the VLOG Standard • The originating processing business is listed on the delivery slips • The certified goods are labelled “VLOG” on the delivery slip • The carrier is VLOG-certified or included in the risk management of a VLOG-certified business in accordance with B1. There is adequate proof of integration. • After loading, the vehicle tank is sealed by employees of the issuing processing business <p>For trading of VLOG-certified food/ingredients of animal origin once they are packaged into final consumer packaging.</p>	<p>B 1-B 3, B 5</p> <p>B 1-B 3, B 5</p>

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
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.			
Feed	For drop shipping of bulk “VLOG geprüft” feed For drop shippers who want to convert non-VLOG-certified feed material into “VLOG geprüft” quality and label it as such*.	For drop shipping of bagged/tamper resistant packaged feed (except for private labelling).	B 1-B 3, B 6 B 1-B 3, B 6, B 7
Private labelling: 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 private labeller's specifications or the goods are purchased from the manufacturer 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 3, B 8, J 1

* (Wording or seal according to Chapter A 1.2.2)

B 2 Details of the Certification Procedure

B 2.1 Risk Grading

Risk grading by the auditor (see Chapter A 3.10) will be carried out according to the following criteria.

Risk Category 0 (There is no or only very low risk)

- Businesses that exclusively transport, trade, handle or store GMO goods within their business premises that are in tamper-resistant packaging and clearly labelled



Explanation: Businesses that transport, trade, handle or store bulk GMOs or feed, raw materials and products produced from them within their business premises may not be graded into Risk Category 0.

Risk Category 1 (There is a medium risk)

Transport, storage and handling of feed, raw materials and products:

- Businesses and process steps with clear physical segregation of feed, raw materials and products for which a “VLOG geprüft” or “ohne Gentechnik” label would be permissible, and of such products that do not meet the requirements for the “VLOG geprüft” or “ohne Gentechnik” label.

Drop shipping and trading of feed, raw materials and products:

- Drop shipping and/ or trading of feed, raw materials and products for which a “VLOG geprüft” or “ohne Gentechnik” label would be permissible, and of such products that do not meet the requirements for the “VLOG geprüft” or “ohne Gentechnik” label.

Transport, storage, drop shipping and handling as well as trading of raw materials/products:

- Businesses and process steps without physical segregation but with temporal segregation of raw materials/products for which an “ohne Gentechnik” label would be permissible and of those that do not meet the requirements of the “ohne Gentechnik” label, but which are not themselves GMOs and/or are not produced from or by GMOs or do not contain GMOs.

Risk Category 2 (High risk)

Transport, storage, handling, drop shipping and trading of feed:

- Businesses and process steps without physical but with temporal segregation of feed for which a “VLOG geprüft” label would be permissible and of products that do not meet the requirements for the “VLOG geprüft” label.

Transport, storage, handling, drop shipping and trading of raw materials/products:

- Businesses and process steps without physical segregation but with temporal segregation of raw materials/products for which an “ohne Gentechnik” label would be permissible and GMOs and/or raw materials/products which are produced from or by GMOs or contain GMOs.

Drop shipping and Trading of feed, raw materials and products:

- Test results from the most recent audit period found non-compliance with the VLOG Standard resulting from the omission of measures to prevent carryover.

B 2.2 Audit Frequency

In the case of individual certification in the Logistics stage, annual routine audits are performed.



Explanation: For matrix certifications in logistics and feed manufacturing, the audit follows the requirements of Chapter D 2.3.

B 2.3 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Risk management (B 3.3)
- Segregation of the flow of goods/exclusion of commingling (B 3.5)
- Handling of non-compliant feed, raw materials and products (B 3.6)
- Traceability (B 3.8)
- Crisis management (B 3.11)
- Incoming goods inspection (B 4.1, B 5.1 , B 6.1)

B 3 General Requirements for Businesses

B 3.1 Facility Description

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

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



Explanation: Information provided in electronic form will be accepted. The up-to-date facility description, annexes and the documents and test results listed therein must 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. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents specified therein are be submitted to the auditor for further processing at the certification body and forwarding to VLOG. Major changes pertaining to VLOG certification include, e.g., change of risk category, other products and/or processes.

B 3.2 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 3.3 Risk Management (KO)

Risk analysis

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

The risk analysis at a minimum covers the following points:

- Raw materials and feed for the “VLOG geprüft” and/or “ohne Gentechnik”/“VLOG” area (incl. countries of origin)
- Handling of feed, raw materials and products that meet the requirements for “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 (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

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

B 3.4 Commissioning External Service Providers

If VLOG-certified businesses commission external, non-VLOG-certified service providers to perform activities in the areas of manufacturing, transport, storage, handling, trade and/or drop shipping subject to certification (Chapter B 1, C 1, G 1), these entities are to be included in the risk management (see Chapter B 3.3) of the business and must comply with the requirements of Chapter A 3.2.1.

B 3.5 Segregation of Goods Flows / Exclusion of Commingling (KO)

The physical and/or temporal separation of goods flows ensures that at no time feed, raw materials or products that are not suitable for “VLOG geprüft” or “ohne Gentechnik” labelling come into contact with the goods flow for feed, raw materials or products with “VLOG geprüft” or “ohne Gentechnik” labelling. Suitable procedural steps are to be in place to ensure that the carryover of 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 3.6 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:

- Labelling of affected feed, raw materials and products
- Notification of customers/buyers and suppliers
- Error management
- Initiation, monitoring, evaluation and documentation of corrective actions
- Blocking and release of feed, raw materials and products
- Documentation and analysis of incidents

The responsibilities are to be defined in the procedure.



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

B 3.7 Outgoing Goods Control / Labelling on Bills of Lading

Feed

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2).

It must be clearly evident to which feed item the labelling refers.



Explanation: VLOG recommends the following wording for labelling feed exempt from labelling and not certified by VLOG:

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

Food

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

Only feed, raw materials and products that meet the requirements for “VLOG geprüft” or “VLOG” labelling may be labelled as such.



Explanation: VLOG recommends the following wording for labelling food items that meet the requirements of the EGGenTDurchfG, but are not included in the VLOG certification of the business:

“Ingredient suitable for the production of “ohne Gentechnik”-labelled food.”

B 3.8 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed or “VLOG” raw materials and products 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 goods flows and their plausibility.



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*
- *Information on delivery date and supplied customers*

B 3.9 Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback 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 3.10 Goods Recall

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

B 3.11 Crisis Management (KO)

A new, 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 responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (cf. Annex XXX or XXXIII), of the certification body and of affected business partners and customers
- Legal advice (if required)

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

B 3.12 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 corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

B 3.13 Documentation and Retention Period

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

All documents relating to the “VLOG geprüft”/“VLOG” transport, storage, handling, drop shipping or trading are to be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the batch/lot + one year, but not less than two years.



Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, training documents etc.

B 3.14 Staff Training

All staff members involved in securing 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 a 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.

B 3.15 Internal Audits

The business must perform annual internal audits that at a minimum cover 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 4 Specific Requirements for Storage and Handling

B 4.1 Incoming Goods Inspection (KO)

Feed

The bills of lading or in the case of packed goods the packaging are to be checked for the “VLOG geprüft” label or “VLOG geprüft” seal within the scope of incoming goods inspection.

Raw materials

The bills of lading are to be checked for the “VLOG” label or “Ohne GenTechnik” seal within the scope of incoming goods inspection.

B 5 Specific Requirements for Trade

B 5.1 Incoming Goods Inspection (KO)

The incoming goods procedure must ensure that all “VLOG” raw materials/products or “VLOG geprüft” feed meet(s) the requirements.

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 packed goods the packaging must be checked for “VLOG geprüft” and/or “VLOG geprüft” seal or “VLOG” and/or “Ohne GenTechnik seal identification.
- the VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

A complaint is to be issued to the supplier for an incomplete bill of lading. The feed or raw materials may be marketed as “VLOG geprüft” and/or “VLOG” only if this quality has been verifiably confirmed by the VLOG-certified supplier.

B 5.2 Sampling and Testing

Feed and/or raw materials and products that are relevant for the “VLOG geprüft” / “VLOG” trade are subject to risk-based sampling and GMO testing in accordance with the following specifications.

B 5.2.1 Sampling and Testing Plan

A written sampling and testing plan must be available that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, 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
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and testing plan is to be implemented according to schedule.

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 test plan must provide for a risk analysis that concludes no need to sample/test any feed/raw materials/products.



Explanation: The VLOG homepage offers an assessment aid to determine the suitability raw materials and products for testing: http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-

[standard_english/Further Documents/Suitability of GMO Analysis for Feed Raw Materials and Foods.pdf](#).

B 5.2.2 Frequency of Sampling and Testing

The annual sampling and testing frequency in the business must at least follow the specifications listed in Table 3 and Table 4.

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

List of VLOG products at site	Bulk “VLOG geprüft” feed	VLOG bagged goods
	Annual minimum number of samples/tests of “VLOG geprüft” outgoing goods ⁷	
Bulk “VLOG geprüft” feed	up to 10,000 t/year: 1 sample/test ≥ 10,000 to 50,000 t/year: 2 samples/tests ≥ 50,000 to 100,000 t/year: 4 samples/tests ≥ 100,000 to 200,000 t/year: 6 samples/tests ≥ 200,000 to 300,000 t/year: 8 samples/tests for every additional 100,000 t: 2 additional samples	no (additional) sampling/testing
Bulk “VLOG geprüft” feed + bulk feed not subject to mandatory labelling		
Bulk “VLOG geprüft” feed + bulk feed subject to mandatory labelling	up to 2,000 t/year: 1 sample/test > 2,000 to 5,000 t/year: 3 samples/tests > 5,000 to 10,000 t/year: 5 samples/tests ≥ 10,000 to 50,000 t/year: 10 samples/tests ≥ 50,000 to 100,000 t/year: 15 samples/tests ≥ 100,000 to 200,000 t/year: 20 samples/tests ≥ 200,000 to 300,000 t/year: 25 samples/tests for every additional 100,000 t: 5 additional samples/tests	no (additional) sampling/testing

Table 3: Yearly minimum of sampling/testing at the Trading of Feed sub-stage

Trading of VLOG raw materials/products:

Risk category	Annual minimum number of samples/tests of outgoing VLOG goods
0	2 x per year
1	6 x per year
2	12 x per year

Table 4: Yearly minimum sampling/testing at the Trading of Food sub-stage



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 4.

B 5.2.3 Handling of Positive Test Results

Positive test results are to be treated according to Annex VI (for food) and Annex V (for feed).

⁷ All feed quantities relate exclusively to “VLOG geprüft” feed or feed that is to be labelled as “VLOG geprüft”.

The handling of the affected feed, raw materials and products in the business must follow the specifications of Chapter F 3.6.

B 6 Specific Requirements for Drop Shipping

B 6.1 Incoming Goods Inspection (KO)

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

B 7 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. It applies exclusively in combination with the requirements for traders (cf. Chapter B 5) or drop shippers (cf. Chapter B 6).

B 7.1 Specific Requirements for Risk Management

In addition to the requirements in Chapter B 3.3, risk analysis includes the following item:

- Risk grading of feed (risk-prone/not risk-prone) for the “VLOG geprüft” area



Explanation: An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: http://www.ohne-gentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Assessment_Aid_-_at_Risk_Feed.pdf.

B 7.2 Sampling and Testing for Conversion

Based on the requirements of Chapter B 5.2, the business must perform sampling and testing with at least the frequency indicated in Table 5 each year.

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

<div><div></div><div>List of all products at site</div></div>	Area	Sampling/testing at “VLOG geprüft” incoming goods	Sampling/testing in “VLOG geprüft” outgoing goods inspection ⁸ (trade incl. conversion)
Only bulk “VLOG geprüft” feed and/or bulk feed not subject to compulsory labelling		For every batch of feed material graded as risk-prone and are supposed to convert	up to 10,000 t/year: 1 sample/test ≥ 10,000 to 50,000 t/year: 2 samples/tests ≥ 50,000 to 100,000 t/year: 4 samples/tests ≥100,000 to 200,000 t/year: 6 samples/tests ≥ 200,000 to 300,000 t/year: 8 samples/tests for every additional 100,000 t: 2 additional samples
Only bulk “VLOG geprüft” feed and bulk feed subject to compulsory labelling, plus, if applicable, bulk feed not subject to compulsory labelling		For every batch of feed material graded as risk-prone and are supposed to convert	up to 2,000 t/year: 1 sample/test > 2,000 to 5,000 t/year: 3 samples/tests > 5,000 to 10,000 t/year: 5 samples/tests ≥ 10,000 to 50,000 t/year: 10 samples/tests ≥ 50,000 to 100,000 t/year: 15 samples/tests ≥100,000 to 200,000 t/year: 20 samples/tests ≥ 200,000 to 300,000 t/year: 25 samples/tests for every additional 100,000 t: 5 additional samples/tests

Table 5: Yearly minimum number of samples/tests for incorporation into "VLOG geprüft" quality of feed material not subject to compulsory labelling⁹

B 8 Specific Requirements for Private Labelling

B 8.1 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 a 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 A 3.2.1).

B 8.2 Contractual Agreement between Private Labeller and Contract Manufacturer (KO)

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

⁸ Sampling in the "VLOG geprüft" outgoing goods inspection is not applicable to drop shipping

⁹ The transfer is only feasible for feed material that can be tested for GMOs

If the contract manufacturer does not have its own VLOG certification, the agreement must obligate the contract manufacturer to comply with the current VLOG Standard and with auditing under A 3.2.1.

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 8.3 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.

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

- the bills of lading or in the case of packed goods the packaging must be checked for “VLOG geprüft” identification.

B 8.4 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 5.2.

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The section below describes the specific rules and requirements for the Feed Stage and its sub-stages.

C 1 Stage Definition and Mandatory Certification

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
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. If a feed manufacturer also operates as a private labeller, the requirements of Part B must be met in addition to the requirements of Chapter C.			
Compound and feed material	For bulk and/or bagged/package compound and feed material produced in the business that are used in the “ohne Gentechnik” production of food and are intended to be advertised as “VLOG geprüft”*.	For bulk and/or bagged/package compound and feed material that are used in the “ohne Gentechnik” production of food and are <u>not</u> intended to be advertised as “VLOG geprüft”.	C 1-C 4, J 1
Mobile grinding and mixing facility: Commercial, multi-operation production of feed using mobile equipment in agricultural operations.			
Compound and feed material	For services rendered in “ohne Gentechnik” production that are to be advertised as “VLOG geprüft”*.	For services rendered in “ohne Gentechnik” production that are not to be advertised as “VLOG geprüft”.	C 1-C 3, C 6, J 1
Feed transport, feed storage/handling and feed trading are part of the Logistics Stage. The checklist for the Logistics Stage (see Annex XIV) must be applied.			

* (Wording or seal according to Chapter A 1.2.2)

C 2 Details of the Certification Procedure

C 2.1 Audit Frequency

Routine audits are to be carried out annually.



Explanation: If a mobile grinding and mixing facility has a QS certification, the VLOG auditing interval for the grinding and mixing facility can, at the request of the business, be adjusted to match the audit interval under QS controls (max. 2 years).

C 2.2 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Risk management (C 3.3)
- Handling of non-compliant feed (C 3.7)
- Segregation of the flow of goods/exclusion of commingling (C 3.6)
- Traceability (C 3.8)
- Crisis management (C 3.11)

C 3 General Requirements

C 3.1 Facility Description

The facility description (Annex XV (Feed Processing) or XVII (Grinding and Mixing Facilities)) is on file and up to date.

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



Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, and documents listed therein are to 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. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. The up-to-date facility description and the documents/information specified therein are to be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

Major changes pertaining to the VLOG certification include, e.g., change of risk category, other feed and/or processes.

C 3.2 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 3.3 Risk Management (KO)

Risk analysis

A documented risk analysis is to be in place 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 for the “VLOG geprüft” area (incl. countries of origin)
- Risk grading of feed (risk-prone/not risk-prone) for the “VLOG geprüft” area



Explanation: An “Assessment Aid – At Risk Feed” is available on the VLOG homepage to assist the feed business: http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Assessment_Aid_-_at_Risk_Feed.pdf.

- 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, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

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

C 3.4 Commissioning External Service Providers

If VLOG-certified businesses commission external, non-VLOG-certified service providers to perform activities in the areas of feed manufacturing, transport, storage and handling subject to certification (see Chapter B 1, C 3.1), these entities are to be included in the risk management (see C 3.3) of the business and must comply with the requirements of Chapter A 3.2.1.

C 3.5 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 packed goods the packaging contain the “VLOG geprüft” label and/or the “VLOG geprüft” seal (see Figure 2). A complaint is to be issued to the supplier for an incomplete bill of lading.

- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

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

A supplier confirmation must be available for all feed, feed additives and processing aids that are classified by the business as risk-prone (see Chapter C 3.3). 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 bill of lading declaring the products to be exempt from labelling or
- A clear contractual regulation regarding the delivery of feed exempt from labelling or



Explanation: VLOG recommends the following wording for the declaration of non-VLOG-certified feed exempt from mandatory labelling: “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 3.6 Segregation of Goods Flows / Exclusion of Commingling (KO)

The physical and/or temporal separation of goods flows must ensure that feedstuffs that are not suitable for “VLOG geprüft” or “ohne Gentechnik” labelling at no time come into contact with the goods flow for feed with “VLOG geprüft” or “ohne Gentechnik” labelling. Adequate procedural steps are to be in place to ensure that the carryover of 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 3.7 Handling of Non-Compliant Feed (KO)

An effective and documented procedure for handling non-compliant feed is to be in place.

At a minimum, it must include the following points:

- Labelling of the 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.



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

C 3.8 Traceability (KO)

The introduced/installed traceability system must guarantee that:

- All “VLOG geprüft” feed existing in the business/at the controlled 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 goods flows and their plausibility.



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 (including re-working)*
- *Information on delivery date and supplied customers*

C 3.9 Complaint Management

A documented system must be introduced to deal with complaints and feedback and comments associated with the requirements of the VLOG Standard. The complaints and feedback 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 3.10 Goods Recall

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

C 3.11 Crisis Management (KO)

A new, 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” raw materials/products. This procedure must be implemented and includes at least:

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

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

C 3.12 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 timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

C 3.13 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 are to be retained for at least the following period, unless statutory provisions require a longer retention period: minimum shelf life of the lot + one year, but not less than two years.



Explanation: Documents that must be retained include delivery slips/protocols, clearance certificates, production and goods flow records (including re-work), training documents etc.

C 3.14 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 at least once a 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 geprüft” operating procedure.

C 3.15 Internal Audits

The business must perform annual internal audits that at a minimum cover the general and business-specific Standard requirements of the Feed 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.

C 4 Specific Requirements for Feed Manufacturing/Processing

C 4.1 Reference Samples

The business consistently retains samples of all batches sent to customers, in suitable containers, so that a conclusion can be drawn as to the actually supplied quality, 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 both to feed delivered in bulk and to packaged feed.

C 4.2 Sampling and Testing

Risk-based sampling and GMO testing is to be performed according to Chapter C 3.3 for the manufacture or labelling of relevant “VLOG geprüft” feed in accordance with the following specifications.

C 4.2.1 Sampling and Testing Plan

A written sampling and testing plan on the basis of the business-specific risk grading (see Chapter C 3.3) for feed in “VLOG geprüft” manufacturing is to be on file that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, 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
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and testing plan is to be implemented according to schedule.

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

In this case the test plan must provide for a risk analysis reaching the conclusion that it is not necessary to sample/analyse any raw materials/feed.



Explanation: The VLOG homepage offers an assessment aid on the suitability of feed for testing: [http://www.ohne gentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further Documents/Suitability of GMO Analysis for Feed Raw Materials and Foods.pdf](http://www.ohne Gentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf).

C 4.2.2 Sampling and Testing Frequency

The annual sampling and testing frequency in the business must at least follow the specifications listed in Table 6.

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

Area	Sampling/GMO testing at “VLOG geprüft” incoming goods	Sampling/GMO testing at “VLOG geprüft” outgoing goods*
Sample material Production at site	Feed material	VLOG-certified feed material and/or VLOG-certified compound feed
Production entirely not subject to compulsory labelling	For every batch of feed material graded as risk-prone	up to 10,000 t/year: 1 sample/test ≥ 10,000 to 50,000 t/year: 2 samples/tests ≥ 50,000 to 100,000 t/year: 4 samples/tests ≥ 100,000 to 200,000 t/year: 6 samples/tests ≥ 200,000 to 300,000 t/year: 8 samples/tests for every additional 100,000 t: 2 additional samples/tests
Dual production	For every batch of feed material graded as risk-prone	up to 2,000 t/year: 1 sample/test > 2,000 to 5,000 t/ year: 3 samples/tests > 5,000 to 10,000 t/ year: 5 samples/tests ≥ 10,000 to 50,000 t/ year: 10 samples/tests ≥ 50,000 to 100,000 t/ year: 15 samples/tests ≥ 100,000 to 200,000 t/ year: 20 samples/tests ≥ 200,000 to 300,000 t/ year: 25 samples/tests for every additional 100,000 t: 5 additional samples/tests

Table 6: Yearly minimum sampling/testing at the Feed Manufacturing sub-stage¹⁰

* 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.

C 4.2.3 Handling of Positive Test Results

Positive feed test results are to be treated according to Annex V.

The handling of the affected feed in the business must follow the specifications of Chapter C 3.7.

C 4.3 Outgoing Goods Control / Labelling on Bills of Lading

VLOG-certified feed must be clearly labelled on all bills of lading or in the case of packed goods on the packaging, using the wording “VLOG geprüft” and/or the “VLOG geprüft” seal (see Chapter A 1.2.2). It must be clearly evident to which feed item the labelling refers.

¹⁰ All feed quantities relate exclusively to feed that is either intended to be used in “VLOG geprüft” production and/or is labelled as “VLOG geprüft”, depending on the respective facility.



Explanation: VLOG recommends the following wording for the declaration of feed exempt from labelling and not certified by VLOG:

“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 5 Specific Requirements for Transport, Handling, Storage, Trading, Drop Shipping and Private Labelling of Feed

If the business performs activities in the area of transport, storage, handling, trading, drop shipping and private labelling of feed that are subject to certification, the relevant requirements according to Part B must be followed. The checklist for the Logistics Stage (see Annex XIV) must be applied.

C 6 Specific Requirements for Mobile Grinding and Mixing Facilities

C 6.1 Specific Measures to Rule out Technically Avoidable Commingling

According to Chapter C 3.6, 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 Chap. C 6.3/ Annex XXIX.

C 6.2 Safeguarding with a Carryover Test

Grinding and mixing facility operators must conduct a carryover test for all technically identical models used to validate the effectiveness of the measures taken against carryover. 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 carryover test must be performed when starting VLOG production and is then repeated at least every 5 years and when there are material changes to the facility (repairs, wear and tear, defects...), which (can) affect the carryover.

The test and its results are to be documented and retained at least until the next test. If necessary, the results can be used to derive appropriate measures.

The carryover test can be omitted in the following cases:

- The facility only grinds/mixes feed not subject to compulsory labelling
- A facility with a complete discharge performs both a complete discharge and a system purge in accordance with the manufacturer's instructions (or based on its own test results) after every mixture subject to compulsory labelling and before every "VLOG mixture"
- For new facilities, if there is a detailed system report from the manufacturer, 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.).

C 6.3 Mixing Documentation and Mixing Protocols

The sequence of the mixtures and the individual mixtures are documented daily for each facility. From the documentation it 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 XXIX or an equivalent mixing protocol and countersigned by the facility operator and the client. 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 6.4 Sampling

C 6.4.1 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 authorises the operator of the mobile grinding and mixing facility to sample the manufactured "VLOG mixture".

C 6.5 Transportation of Feed or Trading of Feed

If the business performs activities in the area of transport, storage, handling, feed trading and private labelling that are subject to certification, the relevant requirements according to Part B must be followed.

C 6.6 Identification on Bills of Lading

VLOG-certified mixtures must be labelled on all bills of lading using the wording “VLOG mixture”.

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D 1 Definition

A matrix is defined as an association of different businesses/sites for the purpose of VLOG 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. 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 certification in the Logistics and Feed manufacturing Stage may be requested for the following six sub-stages:

- Transport of feed, raw materials and products
- Trade/drop shipping of feed, raw materials and products (incl. conversion of feed to “VLOG geprüft” quality)
- Storage/handling of feed, raw materials and products
- Private Labelling
- Production/processing of feed
- Mobile grinding and mixing facilities

Several of these sub-stages may be combined in a single matrix certification.

Matrix members are subject to the corresponding requirements of Stage B and/or C. The specifications of this Chapter apply additionally.

D 2 Details of the Certification Procedure

D 2.1 Conditions and Requirements for the Certification

- Contract between the matrix organiser and a VLOG-recognised certification body
- Signed Standard Usage Agreement¹¹ between the matrix organiser and VLOG



Explanation:

- *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 independent single certification according to the VLOG Standard is not permissible for the same activity area.*
- *The “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 D 2.2.1, the matrix organiser has performed the initial collection of data and, if applicable, the certification body has performed an audit at the site, and the site has been approved by the certification body for the VLOG matrix.*
- *Only one certification body may be commissioned for the entire matrix certification. It is not permissible to retain multiple certification bodies for one matrix certification.*

¹¹ Known as “Certification Agreement” until 20 June 2017.

D 2.2 Certification Procedure

The matrix certification for logistics and feed manufacturing is to occur in the following steps: (see Chapters D 2.2.1 to D 2.2.8).

- Application for certification made to a VLOG-recognised certification body and submission of the matrix description (see Chapter D 3.1), including risk grading of the sites.
- In case of 33%-process (see D 2.2.2): initial collection of data by the matrix organiser
- Audit planning by the certification body with the matrix organiser (scope, date/time, duration of audit)
- Audit performance at the matrix organiser and the matrix site according to Chapter A 3.7 by the auditor, incl. evaluation of requirements, review of risk grading
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
 - including confirmation of the approved sites
- Certification of the VLOG matrix for logistics and feed manufacturing

The described procedure is also to be applied to new matrix sites.

D 2.2.1 Application for Certification, Submission of the Matrix Description

The matrix organiser applies to the certification body for matrix certification in accordance with the VLOG Standard, and submits the matrix description (see Chapter D 3.1).

The matrix organiser determines the basis on which the VLOG initial certification and the future approval of additional sites will be carried out (see Annex IX):

- **33%-process:** Initial data collection at matrix sites by the matrix organiser, together with audits by the certification body of the matrix organiser, at 100% of feed manufacturers and 33% of logistics sites (see Chapter D 2.2.2)

or

- **100%-process:** Audit of the matrix organiser and all matrix sites by the certification body (see Chapter D 2.2.3).

The selected procedure of initial certification applies to the approval of new sites in a VLOG matrix for Logistics and Feed manufacturing. The certification body then updates the member and site list (see Chapter D 3.1).



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

Without an 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. If this is not the case, a corresponding number of sites/applicants must be audited by the certification body prior to acceptance to meet this value. 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 without a certification body audit. If three additional sites are added to the matrix in October, one of them would have to be audited by a certification body (33% out of 12 = 4).

D 2.2.2 Initial Certification Based on Initial Data Collection by the Matrix Organiser (33%-process)

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



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 self-monitoring on the basis of the VLOG checklists by demonstrably competent personnel of the matrix organiser, and thereby verifies the information in the site-related facility descriptions of the individual sites. 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 to the certification body, also indicating the corresponding risk categories for each site.

The certification body reviews and evaluates the matrix description and the site-related facility descriptions of all matrix sites and the matrix organiser. 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 from 100% of feed manufacturers and at least 33% of logistic sites (resp. mobile grinding and mixing facilities) by comparing them to its own initial audits.



Explanation: 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 facility and organisation, geographic location, supplier, etc. If the certification body considers it necessary, it may also audit more than 33% of the sites.

The certification body must compare the results of the initial data collections with its own results and will initiate whatever measures may be required.

The audit intervals for every individual site for the upcoming audit period are to be determined by the certification body. The certification body will also review the risk categories of the logistics sites.



Explanation: The certification body has the right not to accept the data collected by the matrix organiser and to conduct an audit of all sites. The decision must be justified in a verifiable manner.



Explanation: Annex IX schematically shows the process of matrix certification.

D 2.2.3 Initial Certification on the Basis of 100% Audits by the Certification Body (100%-process)

As an alternative to D 2.2.2, all audits are to be performed by the certification body (see Annex IX):

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



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

The matrix organiser is to transmit the site-related facility descriptions of the sites to the certification body. The certification body performs VLOG audits in accordance with Chapter A 3.7 at the sites. Risk grading and the certification decision are to be reviewed based on the VLOG audit.

D 2.2.4 Effects of Audit Results on Labelling and Marketing

- If, due to the audit results, the certification of the VLOG matrix is suspended or revoked, the labelling of products with “VLOG”/“VLOG geprüft” is not permitted for any members of the VLOG matrix.
- The matrix may continue to market raw materials and products labelled “VLOG” and feed labelled “VLOG geprüft” even if individual sites were excluded from the matrix. In this case, the marketing of raw materials and products labelled “VLOG”/feed labelled “VLOG geprüft” will be prohibited only for the excluded former sites.

D 2.2.5 Certificate Issuance

The VLOG certificate will be issued for the VLOG matrix logistics and/or feed manufacturing and must contain the company name of the matrix organiser. The matrix organiser will also receive the list of sites from the certification body. For matrix certifications in logistics and feed manufacturing, the site list must contain the following for each matrix site:

- The defined risk category (for logistic sites)
- The last routine audit date

D 2.2.6 Issuance of Certificates for Group Members

The certification body may issue the facility a certificate stating that it is part of a VLOG matrix certification. This certificate, which lists the stage of the site, will state that the certificate is only valid as long as the facility is a member of the VLOG matrix and the matrix has a valid certificate.



Explanation: The matrix organiser’s permission is not necessary to issue the certificate. However, it the competent certification body should inform the matrix organiser of the issuance of the certificate.

D 2.2.7 Change / Update of the Site List

The matrix organiser must report changes and/or updates to the site list (see D 3.1) to the certification body without delay.



Explanation: The site list represents an overview of the businesses/sites approved by the certification body for the VLOG matrix logistics and feed manufacturing.

D 2.2.8 Distribution of the Audit Report

For each audit, the matrix organiser and/or the audited site are to receive an audit report from the certification body including any deviations found and measures to be implemented.

D 2.3 Follow-up Certification and Monitoring/Audit Intervals

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective measures at the sites.

In the case of logistics and feed manufacturing matrix certifications, the certification body is to perform an audit of the matrix organiser every year; for the matrix sites, audits at the intervals specified below. The audit interval commences as of the date the certificate is first issued.

Audit intervals of different sites:

- Feed manufacturing sites must be audited annually by the certification body



Explanation: All matrix sites of the logistics and mobile grinding and mixing facilities stage must be audited by the certification body within 3 years.

D 2.4 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Contractually binding of the members (D 3.2)
- Risk management (D 3.3)
- Handling of non-compliant feed, raw materials and products (D 3.6)
- Crisis management (D 3.9)

D 3 Requirements for Matrix Organisers

D 3.1 Matrix Description, Site List, Facility Description

Matrix description (see annex XVIII)

The matrix organiser must submit a current matrix description to the certification body when applying for VLOG certification. The matrix organiser must promptly notify the certification body of major changes pertaining to the matrix description pertaining to the 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 subcontractors/contract processors/outsourced processes, 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 matrix certification 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)

Site list (see annex XVIII)

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

- Address/clear identification of the site, official authorisation number, contact person and its contact information, name of business associated with the site.
- The defined risk category (for logistic sites)
- 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.



Explanation: At the request of VLOG, the matrix organiser must promptly send the current list of sites to VLOG.

Facility description of sites

The matrix organiser is responsible for the facility descriptions of the sites and for keeping them up to date. There is one facility description for each site. The matrix organiser will notify the certification body promptly of any internal changes pertaining to certification. The certification body decides whether additional audits must be performed outside the regular intervals.



Explanation: Major changes pertaining to the VLOG certification include, e.g., changes to products and/or processes.

D 3.2 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
- Specifications and duties under the individual risk management of the matrix
- Member obligation to implement the corrective measures ordered by the matrix organiser by the specified deadlines. The member must sign the agreement (declaration of participation).

D 3.3 Risk Management (KO)

Risk analysis

There is a documented risk analysis for all relevant feed, raw materials, products, procedures and processes, including risk assessment for “ohne Gentechnik” or “VLOG geprüft” labelling (analogous to the HACCP concept).

The risk analysis includes at least:

- Feed, raw materials and products for the “ohne Gentechnik”/“VLOG”/“VLOG geprüft” area
- 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, previous cargo in the case of vehicles
- Suppliers (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

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

There must be an annual review of the risk management, including a review of the matrix description, e.g. as part of an internal audit.

D 3.4 Implementation of the Requirements for Sampling and Testing

Sampling and testing plan

The matrix organiser must submit a written sampling and testing plan for the matrix sites, which defines the risk-based sampling and GMO testing for risk-prone feed, raw materials and products of relevance for “VLOG”/“VLOG geprüft” processes in the business. The sampling and testing scopes can be found in the corresponding chapters of Parts B and C. The matrix organiser must ensure compliance with the sampling and testing plan. The various productions/processing technologies of the sites are to be taken into account when generating the sampling and testing plan.

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

- A written, documented risk analysis of the utilised/handled at-risk feed, raw materials and products, and the associated definition of the risk-prone feed (see C 3.3), raw materials and products to be sampled/tested
- 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
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the testing procedure (commissioned laboratory, scope of testing).

The sampling and testing plan is to be implemented according to schedule.

Evaluation of the analytical data

The matrix organiser:

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

Handling of positive test results

In case of positive GMO test results, the matrix organiser must initiate (corrective) measures according to Annex V (for feed) and Annex VI (for food) as well as the provisions of Chapters B 5.2.3 or C 4.2.3.

i *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.*

D 3.5 Staff and Member Training by the Matrix Organiser

All staff members of the matrix organiser involved in the operating procedures of relevance to “VLOG”/“VLOG geprüft” certification must be trained 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 a 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.

i *Explanation: Employees of the matrix organiser involved in relevant operating processes for “VLOG”/“VLOG geprüft” include, for example, QM, Procurement etc.*

D 3.6 Handling of Non-Compliant Feed, Raw Materials and Products (KO)

The matrix organiser has to have an effective and documented procedure for handling non-compliant feed, raw materials and products in place. This includes at a minimum the following steps:

- Labelling of affected feed, raw materials and products
- Notification of customers/buyers, suppliers and matrix members
- 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.

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

D 3.7 Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback 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 3.8 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 3.9 Crisis Management (KO)

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

A new, 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 be followed in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency numbers
- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (cf. Annex XXXI), of the certification body and of affected business partners and customers
- Legal advisement (if required)

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

D 3.10 Corrective Action / Continuous Improvement Process

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

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

D 3.11 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 the “VLOG geprüft”/“VLOG” labelling 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.

D 3.12 Internal Audit

The matrix organiser must perform annual internal audits, which at a minimum cover the general and business-specific Standard requirements of the matrix certification stage. The matrix organiser is subject to annual audits, which at a minimum cover the general and business-specific Standard requirements of the matrix certification 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.

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In the following part, the specific rules and requirements for the Agriculture Stage (inkl. Animal Transport and Livestock Trade) and its sub-stages are described.

E 1 Stage Definition and Mandatory Certification

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Animal production: The production or rearing of primary products of animal origin, including milking and livestock production (including aquaculture) before slaughter.			
	<p>For any agricultural operation that carries out primary production to be labelled as “ohne Gentechnik” and whose “ohne Gentechnik” production exceeds the following business sizes:</p> <ul style="list-style-type: none"> • Apiary: < 50 beehives • Egg-producing operations: < 350 animal spaces • Milk production: annually < 10 cows <p>For any agricultural operation that carries out primary production to be labelled as “ohne Gentechnik” and that is a member of a VLOG group (see Part F).</p> <p>For businesses that sell pullets to the aforementioned primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period and that exceed the following business sizes:</p> <ul style="list-style-type: none"> • Producers of laying hens: < 700 animal spaces 	<p>For any agricultural operation that carries out primary production to be labelled as “ohne Gentechnik” and fulfils the following business sizes:</p> <ul style="list-style-type: none"> • Apiary: < 50 beehives • Egg-producing operations: < 350 animal spaces • Milk production: annually < 10 cows <p><i>If an agricultural operation is smaller than one of the aforementioned business sizes for primary production, a document check is necessary. Please contact the VLOG Head Office in this regard.</i></p> <p>Until 21 December 2020 for agricultural operations that produce young animals/livestock but do not produce any food and whose “ohne Gentechnik” feeding can be</p>	<p>E 1-E 4, J 1 if applicable</p> <p>E 1-E 4, J 1 if applicable</p> <p>E 1-E 4, J 1 if applicable</p>

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	<p>As of 01 January 2021, for agricultural businesses that sell young animals/livestock (except for pullets) to primary producers and whose “ohne Gentechnik” compliant feed is to be applied the minimum feeding conversion period (e.g. producers of calves, heifers, piglets) and that exceed the following business sizes:</p> <ul style="list-style-type: none"> • Cattle rearing: < 20 livestock units of cattle • Producers of laying hens: < 700 animal spaces for pullets • Producers of piglets: < 250 animal spaces for piglets under 30 kg 	<p>recognised within the scope of a supplier confirmation (e.g. producers of calves, heifers, piglets).</p> <p>As of 1 January 2021 for agricultural businesses that sell young animals/livestock to primary producers and whose “ohne Gentechnik” compliant feed is to be applied to the minimum feeding conversion period and that fulfil the following business sizes:</p> <ul style="list-style-type: none"> • Cattle rearing: < 20 livestock units of cattle • Producers of laying hens: < 700 animal spaces for pullets • Producers of piglets: < 250 animal spaces for piglets below 30 kg <p><i>If an agricultural operation is smaller than one of the aforementioned business sizes or sells young animals/livestock, a document check is necessary. Please contact the VLOG Head Office in this regard.</i></p>	E 1-E 4, J 1 if applicable
Plant-based production: The cultivation of primary products, including harvesting and foraging.			
Cultivation of feed	For the cultivation of feed used within the operation for the production of food of animal origin with the “Ohne Gentechnik” label.	For the cultivation of feed not used within the operation for the production of food of animal origin with the “Ohne Gentechnik” label.	E 1-E 3, E 5, J 1
Cultivation of food/raw materials		For the production of plant-based raw materials/food.	

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Animal transport/livestock trade: Any movement of animals in one or more means of transport as well as all related processes, including loading, unloading, transferring and resting, until the completion of unloading of the animals at the intended destination.			
	Livestock trade (applies for trading VLOG animals)	<p>Applies to animal transport, provided that all of the following three conditions are met:</p> <ul style="list-style-type: none"> • Commissioning by a VLOG certified business. • Transport is integrated into the risk management of the VLOG certified business. • An agreement is in effect between the carrier and the certified business regarding compliance with the requirements of the VLOG Standard. <p>For animals which have not yet begun the minimum feeding conversion period.</p>	E 1-E 4, E 6

E 2 Details of the Certification Procedure

E 2.1 Criteria for Risk Grading in the Area of Animal Production

Risk grading by the auditor (see Chapter A 3.10) will be carried out according to the following criteria. In case different results are obtained using the different criteria for risk assessment, the business will be graded as belonging to the highest/strictest risk category.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
GMO feed within the business	<p>Only possible if all of the following criteria are met:</p> <ul style="list-style-type: none"> No feed subject to compulsory labelling, or only feed subject to compulsory labelling, which cannot be swapped, is present at the site. Installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling are completely segregated from the VLOG operating unit. 	<p>Feed subject to compulsory labelling, which can be swapped, is present at the site.</p> <p>Grading in Risk Category 1 is only possible if installations/feeding equipment/machines that come into contact with feed subject to compulsory labelling, which can be swapped, are completely segregated from the VLOG operating unit.</p>	<p>Following initial conversion to “ohne Gentechnik” production (or conversion to “ohne Gentechnik” production, possibly with a time lag), feed subject to compulsory labelling, which can be swapped and is handled with the same installations/feeding equipment/machines used for “ohne Gentechnik” feed manufacturing is present at the site¹².</p>

¹² This also includes the internal or external dual use of mixer vehicles for “ohne Gentechnik” production.

Grading criterion	Risk Category 0	Risk Category 1	Risk Category 2
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 not subject to compulsory labelling used in “ohne Gentechnik” production (which do not fall under the exceptions in Chapter E 4.9.1)	Potentially risk-prone feed and feed suppliers (excluding see Chapters B 1, C 1) must be certified pursuant to the VLOG Standard or a standard recognised as equivalent. This also applies to oils used for dust binding in grinding and mixing facilities.		Potentially risk-prone feed that has not been certified pursuant to the VLOG Standard or a standard recognised as equivalent is used. Potentially 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 (see B 1, C 1).
Use of: <ul style="list-style-type: none"> mobile grinding and mixing systems used by several businesses or stationary grinding and/or mixing facilities of agricultural selfmixers 	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.	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.	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 criterion	Risk Category 0	Risk Category 1	Risk Category 2
		<p>Grading into Risk Category 1 is only possible if all of the following requirements are verifiably met:</p> <ul style="list-style-type: none">• The utilised facility holds certification in a recognised quality assurance system (e.g. QS, KAT).• Measures to prevent carryover of GMO are described in the QM manual of the facility operator.	<p>Grading into Risk Category 2 is done if the facility used is not certified according to a recognised quality assurance system (e.g. QS, KAT).</p>

E 2.2 Audit Frequency

Annual routine audits are carried out for individual certification of agricultural operations.

In the case of agricultural group certifications, audits are performed in accordance with Chapter F 2.4.

If a cattle trader/carrier is QS-certified, the VLOG audit interval can be adjusted to match the QS audit, provided the following conditions are met:

- The animals are transported directly from the supplier to the buyer (e.g. slaughterhouse) without interim stabling and feeding

or

- Only animals with individual IDs may be unloaded or reloaded between the starting point and the transport destination (e.g. at a collection point) and the cattle trader/carrier does not feed VLOG animals.



Explanation: If an agricultural business is certified as part of a VLOG group certification for one area and is individually certified for another area, the audit interval for the individual certification can be adjusted to match the group certification. In that case, the highest risk category for the operating units in the certified areas is to be used to calculate the audit interval.

Example: A facility is included in a group certification for the production of raw milk and is individually certified for beef. The entire facility falls into Risk Category 0. In this case, the audit interval for beef can be adjusted to match the audit interval for raw milk (max. 3 years).

E 2.3 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Handling of non-compliant feed, products and animals (E 3.5)
- Traceability (E 3.6)
- Crisis management (E 3.9)
- Incoming goods inspection (E 4.5, E 5.1, E 6.1)
- Compliance with the minimum feeding conversion period (E 4.6)
- Segregation of goods flows/exclusion of carryover from GMO feed, commingling and swapping (E 4.7, E 5.2, E 6.3)

E 3 General Requirements

E 3.1 Facility Description

The facility description in accordance with Annex XX or XXI must be available and up to date.

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



Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, 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. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. 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 include, e.g., change of risk category.

E 3.2 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 smaller facilities¹³, this may be done as part of the facility description.

E 3.3 Risk Management

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
- Carryover and commingling through third parties
- Carryover within the business (e.g., via equipment or personnel)
- Multi-operation uses of machines, facilities / external service providers (see Chapter E 3.4)



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

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, and carryover 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 spatial and temporal separation or logistical measures
- implemented accordingly and
- reviewed for efficacy as part of the self-monitoring process.

¹³ For definition see Glossary

In any case, appropriate measures are required at the beginning of the feeding conversion to avoid carryover and commingling with GMOs, including all equipment, storage areas, facilities, mixing facilities, transportation means, etc. that come into contact with the feed.



Explanation: If in addition to the GMO-free feed other animals are fed in an agricultural operation with feed that must be labelled or which is grown in the vicinity of genetically modified crops, there is a strongly increased risk of carryover through residual feed, shared use of equipment, dust, etc.



Explanation: If the facility description covers all individual and risk-based procedural steps, a separate document will not be required.

E 3.4 Joint Use of Machines, Facilities / External Service Providers

- If machines/facilities for feed cultivation, feed processing and production are used jointly by several agricultural operations, and/or
- Tasks are outsourced to external service providers,

this is to be taken into account in the risk management (E 3.3) of the business, and corresponding process steps and measures to prevent GMO carryover are to be established. If measures are necessary to ensure compliance with the requirements of the VLOG Standard in case of shared machine use or subcontracted businesses, a separate compliance agreement must be signed with these businesses.

If activities subject to certification are outsourced to an external service provider (cf. Chap. B 1, C 1, G1, E 1), the requirements of Chapter A 3.2.1 must be met.

E 3.5 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.

This includes at a minimum the following steps:

- 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.

Positive feed test results are to be treated according to Annex V.

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 area dedicated to “Ohne Gentechnik” production once the erroneous labelling becomes known.

If a serious infraction of non-GMO feeding invalidating “Ohne Gentechnik” labelling occurred through faulty labelling of feed, the minimum feeding conversion period for the animals concerned must start anew, if applicable, shortened according to specific circumstances.



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 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/).

E 3.6 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 goods flows and their plausibility.



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 3.7 Complaint Management

Individual certification

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback 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.

Group certification

Agricultural operations that are included in the group certification must inform the group organiser in the event of complaints and claims and coordinate corrective measures with the group organiser.

E 3.8 Goods Recall

An effective and documented procedure must be in place for the goods recall of non-compliant products or animals according to the VLOG Standard, including the definition of responsibilities.



Explanation: No goods recall procedure is needed for products and animals that cannot be taken back (e.g. raw milk, eggs).

E 3.9 Crisis Management

Individual Certification

In the event of an incident, the agricultural operation must notify the competent certification body. Further measures will be agreed upon with the group organiser.

A new, 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/products. This procedure including the contingency plan must be implemented and must comprise at least:

- The steps to follow in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provision requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (cf. Annex XXXII), of the certification body and of affected business partners and customers

Group Certification

For agricultural operations that are included in a group certification, the group organiser would take over crisis management. In the event of an incident, the agricultural operation must notify the group organiser. Further measures will be agreed upon with the group organiser.

E 3.10 Corrective Action

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

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

E 3.11 Documentation and Retention Period

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

All documents relating to “ohne Gentechnik” production are to be retained for at least the following period, unless statutory provisions require a longer retention period: five years.



Explanation: Documents that must be retained include bills of lading, invoices for operating materials (e.g. seeds), feed accompanying documents, training documentation, orders, declarations, etc.

E 3.12 Staff Training

All staff involved in the operating procedure of the “VLOG” sector shall be trained concerning the requirements of the VLOG-Standard and the operating procedures laid down therein. Training shall take place before they take up their activity as well as on a continuous basis at least once a 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 operations, there is no need for separate “VLOG” training for employees.

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.

E 3.13 Self-monitoring

An internal self-monitoring is to be performed once per year. During this monitoring, the facility description will be checked and updated as appropriate. The monitoring and results must be documented.

E 4 Specific Requirements for Animal Production

E 4.1 Animal Inventory

All animal species or animal categories kept in the business for food production are recorded in a current livestock overview. This must include whether these animals are fed in accordance with the "ohne Gentechnik" Standard or not.

E 4.2 Feed Ordering

Risk-prone feed that is not VLOG certified (cf. E 4.9.1) 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



Explanation: The agreement must comprise at least the names and addresses of the businesses involved and the name of the feed(s) included in the agreement.

- 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: ...”



Explanation: Non-risk-prone feed (cf. E 4.9.1, e.g. VLOG certified feed bearing a reference to and/or the “VLOG geprüft” seal) may be used without written orders, without additional contractual agreement and without other accompanying documents.

E 4.3 Feed List

An up-to-date feed list must be available, in which all feeds used in the business, their origin as well as their intended use (animal species/animal category) are indicated



Explanation: The feed list serves as an aid for ensuring “Ohne Gentechnik” feeding:

- *The list may serve as a basis to verify and ensure that appropriate certificates are at hand for every delivery of feed, certifying that this feed is not subject to compulsory labelling.*
- *Identification of overlaps in the purpose of feed for different animal species. This is decisive especially when feeding with feed not subject to compulsory labelling occurs at the agricultural operation simultaneously with feed that is subject to compulsory labelling. These are to be labelled “interchangeable”.*

The feed list must initially be drawn up within the scope of a first assessment. After that it must be kept up to date by adding new feeds and new suppliers, and by deleting those that no longer exist. However, the latter may only be done once the respective feed has been fully consumed and is no longer present on the premises. Additions and deletions must be noted with the date of the first purchase or the date of the last consumption. All self-produced feed shall also be entered in the feed list.

An alternative for small businesses¹⁴ is a feed list realised by chronologically filing invoices and bills of lading.

E 4.4 Feed Rations

Current feed rations for all animal species and animal categories of “Ohne Gentechnik” production must be documented, taking into account differences in life phases or season.

E 4.5 Incoming Goods Inspection of Feed (KO)

It must be ensured at goods receiving that only feed exempt from the labelling obligation be used for “Ohne Gentechnik” production.

¹⁴ Definition see glossary

Incoming goods inspection of bulk VLOG certified feed:

- When bulk animal feed is received, the accompanying bills of lading must be checked for the “VLOG geprüft” seal. A complaint is to be issued to the supplier for an incomplete bill of lading.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once annually.

Incoming goods inspection of bagged VLOG certified feed:

- All bags must be checked for the “VLOG geprüft” seal.
- The VLOG certification of the feed producer and/or supplier is to be checked periodically, the minimum being once annually.



Explanation: Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification.

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.

All bills of lading for purchased feed must be reviewed for completeness of the information provided and filed in chronological order.

E 4.6 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 7. 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 barns before the age of 3 days ¹⁵	ten weeks
Poultry for egg production	six weeks
Other animal species/categories	from the time of birth/hatching

Table 7: Minimum feeding conversion period according to EGGenTDurchfG (see EGGenTDurchfG, most recently amended by Art. 58 V of 31 August 2015 | 1474)

¹⁵ 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.

Ensuring the aforementioned minimum feeding conversion periods within the business is to be verified by means of the feed list (see Chapter E 4.3) and feed bills of lading/cultivation records.

If an animal was fed with feed subject to compulsory labelling during or after the minimum feeding conversion period, the conversion period must start anew for this animal (see chapter E 3.5).

Purchase of animals from previous owners who are not VLOG-certified

Until 31 December 2020, the “ohne Gentechnik”-compliant feeding period of the previous owner can be applied to the minimum feeding conversion period only if written confirmation by the previous owner is available in accordance with Annex II.

As of 01 January 2021, “ohne Gentechnik”-compliant feeding by the previous owner can only be applied to the minimum feeding conversion period if the previous owner (cf. E 1 for exceptions) is certified according to the VLOG Standard or a standard recognised as equivalent.



Explanation: As an alternative to the use of Annex II, a contractual agreement can be concluded with the previous owner for “ohne Gentechnik”-compliant feeding (including appropriate measures) until 31 December 2020.

This agreement must include at least the following:

- *There must be a documented procedure for tracing the time from which individual animals were given “ohne Gentechnik”-compliant feed. The functionality of the procedure must be verifiable by third parties.*
- *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.*

Exception for pullets: “Ohne Gentechnik”-compliant feeding by the previous owner of the pullets can only be applied if that business is certified by VLOG to raise pullets.

Purchase of animals from VLOG certified previous owners

For the period of “ohne Gentechnik”-compliant feeding to count:

- There must be a written confirmation, including date, of the time from which the animals verifiably were consistently given “ohne Gentechnik”-compliant feed until their sale and
- The VLOG certification of the previous owner must be checked regularly, at least once per year.

E 4.7 Segregation of Goods Flows/Exclusion of Carryover from GMO Feed, Commingling and Swapping (KO)

Feed of different qualities:

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

- The business does not carry out any conventional production of the same animal category with feed subject to compulsory labelling parallel to “ohne Gentechnik” production.

- Permissible exception: The different productions take place in completely different operating facilities, which also involves completely separate storage and handling of feed.
- The facility's individual measures specified in Chapter E 3.3 must ensure in a traceable manner that at no time feed that requires labelling can make its way into the flow of feeds intended for the production of “Ohne Gentechnik” food.
 - The flows of goods are segregated spatially and/or temporally.
 - In the case of temporal segregation, it must be ensured by suitable process steps that any carryover of GMO is reduced to a technically unavoidable minimum. Before beginning the “ohne Gentechnik” feeding – especially in case of frequent switching between “ohne Gentechnik” feed and feed subject to compulsory labelling – the measures determined according to Chapter E 3.3 are to be carried out and documented. It must also be documented where any residual quantities of feed that requires labelling were moved to.



Explanation: Vehicles, for example, must be verifiably dry cleaned after having transported bulk feed subject to compulsory labelling.

- Furthermore, in the case of temporary segregation in the handling of feed subject to compulsory labelling and feed not subject to such labelling for “ohne Gentechnik” production intended for production of “Ohne Gentechnik” food, the effectiveness of the measures must be proved by means of representative testing results.

If interchangeable feed subject to compulsory labelling is available, the following additional requirements must be complied with:

- Feed subject to compulsory labelling which can be swapped 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 “ohne Gentechnik” 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. soy bean meal as feed material).



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.

If feed mixer vehicles are used internally or externally for both feed subject to compulsory labelling and feed not subject to compulsory labelling, appropriate measures for avoiding carryover/commingling 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 “Ohne Gentechnik” production. The system purge is to be used outside of “Ohne Gentechnik” production.

Products of different qualities:

If the business simultaneously handles “ohne Gentechnik”/“VLOG” products it produces itself and products not suitable for “Ohne Gentechnik” labelling, it must be ensured by appropriate measures that no commingling or swapping of food of the different qualities occurs. Furthermore, 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, from receiving the feed through animal production to delivery/transport of the animal products/animals.

E 4.8 Use of Grinding and Mixing Facilities

E 4.8.1 Joint Use of Grinding and Mixing Facilities

E 4.8.1.1 Contractual Agreement with the Facility Operator

For use of grinding and mixing facilities that are VLOG-certified or certified under a standard recognised as equivalent:

- the operator of the mobile grinding and mixing facility must have written permission from each VLOG certified agricultural operation or agricultural VLOG group member. This authorises the operator of the mobile grinding and mixing facility to sample the manufactured “VLOG mixture”.
- The VLOG certification of the grinding and mixing facility is checked regularly, but at least once a year.

For use of mobile mixing and grinding facilities that are not VLOG-certified or certified under a standard recognised as equivalent, there must be a written agreement between the farmer and the facility operator which covers the following points:

- The facility operator's commitment to scheduled maintenance and cleaning of the respective facility as well as its use according to the operating manual
- Obligation to perform at least a complete discharge and/or system purge following mixtures subject to compulsory labelling and before use in VLOG production, depending on the facility type and internal risk assessment. The complete discharge and/or system purge ensures that the feed will not be subject to compulsory labelling as a result of using the facility. The measure can be substantiated by a facility report/attestation by the facility manufacturer, for example. Regardless of the operator's risk assessment, a system purge must be performed whenever the previous mixture was composed of more than 40% feed subject to compulsory labelling (relative to total mixture weight). This is mandatory even if a complete discharge has already been performed.
- Obligation to carry out the system purge according to the manufacturer's instructions and in a sufficiently large quantity.
- Commitment to document the grinding and mixing processes carried out based on the grinding and mixing protocol according to Annex XXIX or an equivalent mixing protocol.
- When purchasing oils/fats from facility operators: commitment to use oils/fats not subject to compulsory labelling for “ohne Gentechnik” production

E 4.8.1.2 Specific Measures to Eliminate Carryover of GMO Feed

The business must define measures in accordance with Chapter E 3.3 to prevent the carryover of GMO feed through the use of mobile grinding and mixing facilities. These measures are to be implemented, documented and checked for effectiveness within the scope of self-monitoring. If system purges from the mobile grinding and mixing facility remain, it is to be ensured that they are not used for “ohne Gentechnik” production.

E 4.8.1.3 Documentation of Feed Mixture

For each grinding and mixing process for the “ohne Gentechnik” production, a grinding and mixing protocol according to Annex XXIX or an equivalent mixing protocol is to be prepared that is completely filled out and signed by the facility operator.

E 4.8.2 Use of Stationary Grinding and Mixing Facilities

E 4.8.2.1 Use of Grinding and Mixing Facilities 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.



Explanation: If a grinding and mixing facility is used exclusively for feed not subject to compulsory labelling/“VLOG geprüft” feed, there are no further requirements.

E 4.8.2.2 Dual Use of Grinding and Mixing Facilities for Feed Subject to Compulsory Labelling and Feed Not Subject to Compulsory Labelling

If the grinding and mixing facility is used for both feeds not subject to compulsory labelling/“VLOG geprüft” feed and feed subject to compulsory labelling, the conditions specified in the following chapters must be met.

E 4.8.2.3 Specific Measures to Eliminate Carryover of GMO Feed

Individual measures/requirements are to be derived, documented and implemented according to Chapter E 4.7 for each facility to prevent the carryover of GMO feed from previous mixtures during the production of mixtures for the “ohne Gentechnik” production. Other risk factors such as *the age of the facilities and repairs* will be taken into account.

The proper operation of facilities must 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 must be performed after processing mixtures subject to compulsory labelling and before using the equipment for VLOG production, depending on the facility type and internal risk assessment. Regardless of the operator’s risk assessment, a system purge must be performed whenever the previous mixture was composed of more than 40% feed subject to compulsory labelling (relative to total mixture weight). This is mandatory even if a complete discharge has already been performed.
- The system purge must be carried out in accordance with the manufacturer’s instructions and in a sufficiently large quantity. The batch size must have a transparent basis (e.g. manufacturer’s specifications regarding carryover or own test results).
- System purges are to be used outside of VLOG production.
- The manner in which complete discharge or system purges are performed has to be clearly documented.
- Removal of residues and purging are to be documented in the mixing protocol according to Annex XXIX.

E 4.8.2.4 Documentation of Feed Mixture

The sequence of the mixtures and the individual mixtures are documented daily for each facility.

The documentation must clearly distinguish between mixtures containing feed that is subject to compulsory labelling and “VLOG mixtures”.

Each completed “VLOG mixture” must be documented with a mixing protocol according to Annex XXIX or an equivalent mixing protocol. This document is to be countersigned by the person preparing the mixture.

E 4.9 Sampling and Testing

This chapter is not relevant for companies of sub-stage Animal Transport and Livestock Trade.

In the business, risk-based sampling and GMO testing of risk-prone feed relevant for “ohne Gentechnik” production is to be carried out in accordance to the following principles.

E 4.9.1 Risk-prone Feed

The following feeds are graded as risk-prone for the Agricultural Stage:

- Feed material from plant species such as soy, rapeseed/canola, maize/corn¹⁶, sugar beet¹⁷, cotton, except:
 - Feed from plant species that are certified in accordance with the VLOG Standard or a recognised VLOG equivalent standard; and/or
 - Feed 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
- Compound feed produced from one or more of the feed materials mentioned in E 4.9.1, except:
 - Compound feed that is certified in accordance with the VLOG Standard or a recognised equivalent standard

E 4.9.2 Sampling and Testing Plan

In individually certified businesses, a written sampling and testing plan must be available that describes the risk-based sampling and GMO testing of risk-prone feeds relevant for “ohne Gentechnik” production in the business.

In compliance with Part J, the sampling and testing plan must at least contain/define the following:

¹⁶ Dried maize/corn grains that can be proven to have been cultivated in Denmark, Germany, France, Greece, Italy, Croatia, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Northern Ireland, Austria, Poland, Scotland, Switzerland, Slovenia, Hungary, Wales, Belgium or Cyprus can be classified as feed that is not risk-prone. This presumes the farmer obtains the maize/corn directly from the drying facility and a meaningful confirmation that only goods not subject to compulsory labelling were dried at the facility, including maize/corn produced in only these countries, is provided.

Traded maize/corn silage made of maize/corn that was demonstrably cultivated in the above-mentioned countries can also be classified as feed that is not risk-prone. This option applies if the farmer obtains the feed from a drop shipper and the delivery proceeds directly from the producer to the customer without intermediate storage OR the maize/corn is obtained from a trader that exclusively stores/handles maize/corn silage that originates from the above-mentioned countries (certification from trader required) OR it is silage that was foil-wrapped/shrink-wrapped by the producer and is delivered to the farmer in this original packaging by a trader. In any case, a conclusive batch-specific certificate of origin/declaration by the drop shipper/trader or producer must be submitted to the farmer.

¹⁷ Feed produced from sugar beet (e.g. sugar beet chips, pellets, molasses) which can be proven to have been cultivated and, if applicable, processed in the EU or Switzerland are not graded as risk-prone feed if the farmer has conclusive confirmation from the manufacturer for each shipment confirming that the goods are feed produced from sugar beet that was cultivated and processed in the EU or Switzerland. This exception applies only for feed in which sugar beet is the only risk-prone feed component. This option applies if the farmer obtains the feed directly from the manufacturer OR the farmer obtains the feed from a drop shipper and the delivery proceeds directly from the manufacturer to the farmer without intermediate storage.

- A written documented risk analysis of the risk-prone feed used and, based on this, the determination of the risk-prone feed to be sampled/tested.
- 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
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test plan (contracted laboratory, scope of testing).

The sampling and testing plan is to be implemented according to schedule.



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:

[http://www.ohne-gentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf](http://www.ohne Gentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf).

E 4.9.3 Sampling and Testing Frequency, Retention of Reference Samples

Sampling frequency:

Sampling must take place in the following cases:

- At every delivery of risk-prone feed material and compound feed¹⁸
- When using a stationary or mobile grinding and mixing facility in accordance with the guidelines in Table 8
- After every change from “ohne Gentechnik” feeding if the VLOG business facility/VLOG barn regularly switches between “ohne Gentechnik” feed and feed subject to compulsory labelling. The corresponding sample must be taken before or at the beginning of the minimum feeding conversion period and at the location where the feed is provided.



Explanation: Sampling of bagged goods (including tamper-resistant and sealed Big Bags) on delivery is not required.

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 categories¹⁹, at least the three most recent reference samples must always be retained, even if they are more than two months old.

Test frequency

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

GMO testing of the sampled feed and feed mixtures must take place in accordance with the test plan and the requirements set out in Part J:

¹⁸ This also applies to the additional purchase of feed from grinding and mixing facility operators

¹⁹ Delivery of risk-prone feed; switch between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling

- at least once in each audit interval from the feed (delivery of risk-prone feed) or the feed mixture (from a non-certified grinding and mixing facility) with the highest risk

and also

- after every switching to “ohne Gentechnik” feeding, if a VLOG operating unit/VLOG barn regularly switches between “ohne Gentechnik” feeding and feeding with feed subject to compulsory labelling.



Explanation: A switch to “ohne Gentechnik” feeding will take place, for example, in a production system where the lifetime of the animals is longer than the “ohne Gentechnik” minimum feeding conversion period (e.g. turkey fattening facility).

If collective samples of feed are analysed, the results may not be factored as test results pertaining to individual operations. For each agricultural operation 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.



Explanation: VLOG operating units/VLOG stables are exempt from feed change tests where a documented wet cleaning of the stable and feed infrastructure (incl. silos) is performed before “ohne Gentechnik” feeding.

Mobile and stationary grinding and mixing facilities

In the respective audit interval, at least the testing frequencies listed in Table 8: Minimum number of tests in the sub-stage mobile/stationary grinding and mixing facility in the respective audit interval

must be implemented in the business.

The samples have to be taken from the mixed feed.

	The mobile grinding and mixing facility is VLOG certified²⁰	The mobile grinding and mixing facility is not VLOG certified	Stationary grinding and mixing facility (only for feed used within the farm)
Facility exclusively processes feed not subject to compulsory labelling	Sampling and testing not required	1 test result per audit interval	Sampling and testing not required
Facility also processes feed subject to compulsory labelling	Sampling and testing not required		1 test result per audit interval OR Farmer performs a carryover test on the facility every 5 years (cf. C 6.2)

Table 8: Minimum number of tests in the sub-stage mobile/stationary grinding and mixing facility in the respective audit interval

²⁰ Or in accordance with a recognised VLOG-equivalent standard

E 4.9.4 Reduction of the Scope of Testing after Feed Switching in Group Organisations:

If the business 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:
 - 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 annually in at least 25% of the sites with regular feed switching.
 - At least one sample must be taken annually by a VLOG certification body from at least 5% of the sites with regular feed switching after such feed switching has been carried out, and must be included in the test. These tests can be counted towards the 25%.
 - Each switching, including any measures taken to avoid commingling and carryover must be documented in writing.



Explanation: A flow chart of this process is available in Annex VII.

If new businesses/sites join the group and also wish to take advantage of the reduced scope of testing, at least one test result of feed switching must be submitted for each new site.

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.

E 4.10 Inspection of Outgoing Goods/Labelling on Bills of Lading

It must be ensured that only such products and animals that meet in full the Standard requirements for “ohne Gentechnik” and “VLOG” labelling leave the business.

VLOG certified products/animals must be labelled on all bills of lading using the wording “VLOG”.

If no waybills/bills of lading are produced due to the nature of the system (e.g. milk collection), an unequivocal contractual regulation is to be made concerning delivery which ensures the above-mentioned labelling.

E 5 Specific Requirements for Plant-based Feed Manufacturing

E 5.1 Incoming Goods Inspection (KO)

At goods receiving it must be ensured that all seeds and seed stock for the production of feed to be used within the business is GMO-free.

The feeds produced internally must be documented in the feed list (see Chapter E 4.3).



Explanation: The GMO-free nature of the seeds and plant material is achieved, for example, by the absence of a label in accordance with Directive 98/95/EC on seed documents/declarations.

E 5.2 Segregation of Goods Flows/Exclusion of Commingling and Swapping (KO)

GMO carryover from GMO cultivation and/or GMO experimental releases into feed produced internally must be prevented. It must be periodically verified whether GMO cultivation or GMO experimental releases 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 risk-specific process steps (e.g. transport and mixing processes) must be documented for each operation with a separate proof of adequate logistical measures (e.g. spatial, temporal separation) or and their efficacy reviewed as part of the self-monitoring process.



Explanation: If the facility description contains all points, no separate document will need to be created.

E 6 Specific Requirements for Animal Transport/Livestock Trade

In the case of livestock traders / animal carriers, the requirements of E 4 and this chapter are checked in addition to the general requirements of the Agriculture stage.

E 6.1 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 organisation) for the area of applicability of the animal species/animal category is to be verified in a risk-targeted manner.

E 6.2 Risk Management

Besides Chapter E 3.3, the risk management including the risk analysis must consider the following points:

- Separate handling of VLOG animals and non-VLOG animals
- If applicable: handling of feed subject to compulsory labelling and feed that is not
- Other business-specific items as necessary



Explanation: In accordance with EGGenTDurchfG, for the production of food products or food ingredients of animal origin labelled with “ohne Gentechnik” it is only permissible to use feed not subject to compulsory labelling.

E 6.3 Segregation of Goods Flows/Exclusion of Commingling and Swapping of Animals (KO)

The risk-targeted process steps for ensuring the Standard requirements are to be documented for each operation with a separate proof of adequate spatial, temporal or logistical measures and their efficacy reviewed as part of the self-monitoring process.

VLOG animals

VLOG animals are always conveyed and/or transported separately from animals that are not VLOG certified. 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):
 - When accepting animals, the animal identification must be checked; only properly identified animals are accepted.
- Animals with farm identification (e.g., pig ear tags specifying the agricultural operation's VVVO number):
 - If only animals that are verifiably VLOG animals are accepted with a transport from an operation, the operation identification of the animals serves as sufficient verification of segregation.

If both VLOG animals as well as animals of other qualities are accepted with a transport from an operation, the different groups must be verifiably segregated during transport/conveyance. The segregation measures must be documented in the transport documents.



Explanation: The unique individual animal identification serves as sufficient verification of segregation.

All employees must be aware of the VLOG status of the individual animals, from acceptance through conveyance/transport, to final delivery.

Part F: Group Organisation Agriculture

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In the following part of the Standard, the group certification process in agriculture and the requirements and specifications for group organisation in agriculture are described.

F 1 Definition and Certification Obligation

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 and the agricultural group members.

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
VLOG agricultural group: A VLOG agricultural group is a combination of at least two agricultural operations (the so-called agricultural group members) for the purpose of VLOG group certification in agriculture.			
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 VLOG agricultural group certification, certification is done through the group organiser, i.e. the group organiser receives the certification for the VLOG agricultural group.			
	Food of animal origin	Plant-based food	F 1-F 3
Agricultural group member, hereinafter group member: Agricultural operation which is contractually integrated into a VLOG agricultural group.			
	For the production and processing of food of animal origin.	For the production of plant-based food.	E 1-E 5

F 2 Details of the Certification Procedure

F 2.1 Conditions and Requirements for the Certification

- Contract between the group organiser and a VLOG recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG²¹



Explanation:

- *A group member may only be a member of one VLOG group for a specific product area (e.g. milk production). If a group member produces animals/animal products for different product sectors (e.g. milk and meat), the business may be a group member of different VLOG groups for each product segment. If a business is a member of a VLOG group, independent certification according to the VLOG Standard is not permissible for this area of applicability.*
- *“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 F 2.2.1, 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.*

F 2.2 Certification Procedure

Group certification in agriculture is to be performed in accordance with the following steps: (see Chapter F 2.2.1 to F 2.2.8)

- Application for certification made to a VLOG recognised certification body and submission of the group description (see Chapter F 3.1) including risk grading of the agricultural operations.
- 25%-process see F 2.2.2): initial collection of group member data by the group organiser
- Audit planning by the certification body with the group organiser (scope, date/time, duration of audit)
- Auditing of the retail group organiser and the retail group members in accordance with Chapter A 3.7 by the auditor including evaluation of the requirements, verification of risk grading
- Audit evaluation/review by the certification body
 - including confirmation/correction of the audit result and correction of the risk grading, if applicable, and
 - including confirmation of the approved retail group members
- Certification of the VLOG agricultural group

The described process must also be applied to new group members.

²¹ Known as “Certification Agreement” until 20 June 2017.

F 2.2.1 Application for Certification, Submission of Group Description

The group organiser applies to the certification body for group certification in accordance with the VLOG Standard, and submits the group description (see Chapter F 3.1).

The group organiser must determine the basis on which the VLOG initial certification and the future approval of additional group members will be carried out (see Annex VIII):

- **25%-process:** Initial collection of group member data by the group organiser, together with audits by the certification body at the group organiser and at 25% of the group members (see Chapter F 2.2.2)

or

- **100%-process:** Audit of the group organiser and all group members by the certification body (see Chapter F 2.2.3).

The chosen initial certification procedure is to be used for approval of new group members of a VLOG agricultural group. The certification body will subsequently update the list of members (see Chapter F 2.2.7).



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

Without an audit, the certification body can only accept a member 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).

F 2.2.2 Initial Certification Based on Initial Data Collection by the Group Organiser (25%-process)

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

The group organiser performs the initial collection of data from all group members, i.e. on-site self-monitoring on the basis of the VLOG checklists by demonstrably competent personnel of the group organiser, and 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 E 2.1. The group organiser subsequently forwards all facility descriptions to the certification body, also indicating the corresponding risk categories for each group member.

The certification body reviews and evaluates the group description and the facility descriptions of all group members and the group organiser. 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.

The certification body must compare the results of the initial data collections by the group organiser with its own results and will initiate whatever measures may be required. The certification body has the right not to accept the data collected by the group organiser and to conduct an audit of all group members. Such a decision must be properly substantiated in detail.

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 for the coming audit period on this grading.

The initial certification of the VLOG group will be based on the initial data collections and the audits by the certification body of the group organiser and the group members; if necessary with follow-up audits.



Explanation: See Annex VIII for a schematic representation of the group certification procedure.

The audit of the group organiser is generally done before the audits of the group members.

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 supplier, etc. If the certification body considers it necessary, it may also audit more than 25% of the group members.

F 2.2.3 Initial Certification on the Basis of 100% Audits by the Certification Body (100%-process)

As an alternative to E 2.2.2, all audits are to be performed by the certification body (see Annex VIII):

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

The group organiser is to transmit the facility descriptions of the group members to the certification body. The certification body then performs VLOG audits in accordance with Chapter A 3.7 at the group members. Risk grading and the certification decision are to be reviewed based on the VLOG audit.



Explanation: The audit of the group organiser is generally done before the audits of the group members.

F 2.2.4 Effects of Audit Results on Labelling and Marketing

- If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with “VLOG” or the “Ohne GenTechnik” seal is not permitted for any members of the VLOG group.
- The continued marketing of “VLOG”- or with “Ohne GenTechnik” seal labelled food by the group is permitted if individual group members are excluded from the group. In this case, only the excluded former group members are prohibited from marketing food labelled as “VLOG” or with the “Ohne GenTechnik” seal.

F 2.2.5 Certificate Issuance

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

Group members do not receive individual certificates.

The certification body also provides the group organiser with a member list, which contains the following data for each group member:

- The defined risk category
- The last routine audit date

- For egg-laying businesses also: the print numbers.

F 2.2.6 Issuance of Certificates for Group Members

If a group member delivers “VLOG” products or animals to another customer aside from the group organiser, the certification body may issue a certificate stating that the facility belongs to a VLOG group certification. The certificate states that it is only valid as long as the facility is a member of the VLOG group and the group has a valid certificate.



Explanation: The group organiser's permission is not necessary to issue the certificate. However, the competent certification body should inform the group organiser of the issuance of the certificate.

F 2.2.7 Modifying/Updating of the Members List

The group organiser must immediately report changes and/or updates affecting the member list (see chapter F 3.1) to the certification body.

F 2.2.8 Distribution of the Audit Report

For each audit, the group organiser and/or the audited group member are to receive an audit report from the certification body including any deviations found and measures to be implemented.



Explanation: The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

F 2.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body with auditing the group members:

- 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)
- the groups must be organised such that each certification body independently audits the 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 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 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.

F 2.4 Follow-up Certification and Monitoring/Audit Intervals

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective measures by the group members.

In the case of agricultural group certifications, the certification body is to perform an audit of the group organiser every year; for the group members, audits at the intervals specified for the corresponding risk category. The audit interval commences as of the date the certificate is first issued.

The following audit intervals apply for the respective risk categories:

- All group members in Risk Category 0 must be audited by the certification body within 3 years (i.e. at the latest in the third following year of the last audit)
- All group members in Risk Category 1 must be audited by the certification body within 2 years (i.e. at the latest in the second following year of the last audit)
- All group members in Risk Category 2 must be audited annually by the certification body.

	<u>Year of Initial Certification</u>	<u>1st Following Year</u>	<u>2nd Following Year</u>	<u>3rd Following Year</u>	<u>4th Following Year</u>	<u>5th Following Year</u>	<u>6th Following Year</u>
<u>Example</u>	2019	2020	2021	2022	2023	2024	2025
<u>Risk Category 0</u>	Initial Audit*	-	-	Audit**	-	-	Audit**
<u>Risk Category 1</u>	Initial Audit*	-	Audit**	-	Audit**	-	Audit**
<u>Risk Category 2</u>	Initial Audit*	Audit**	Audit**	Audit**	Audit**	Audit**	Audit**

Figure 3: Audit intervals of agricultural operations applicable to group certifications

* 25%-process: Auditing by group organiser and of at least 25% of group members by the certification body. 100%-process: Auditing 100% of the group by the certification body.

**Audit by Certification Body

F 2.5 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Contractually binding of the group members (F 3.2)
- Risk management (F 3.3)
- Handling of non-compliant feed, products and animals (F 3.6)
- Crisis management (F 3.9)

F 3 Requirements for Group Organisers

F 3.1 Group Description, Members List and Facility Description

Group Description (see annex XXIII)

The group organiser must submit a current group description to the certification body when applying for VLOG certification. 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 activities of the subcontractors/contract processors/outsourced processes, 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 operations, sampling, testing, etc.*)
- The persons in charge of group certification 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)

Members list (see annex XXIII)

The current members list for the group certification must have been submitted. It must at least contain the following information for each group member:

- Address, official authorisation number, contact person and contact data
- The defined risk category
- The last routine audit date
- For egg-laying businesses also the print numbers.

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 list of members to VLOG.

Facility Description

The group organiser is responsible for the facility descriptions of the group members and for keeping them up to date. The group organiser must notify the certification body promptly of internal facility changes that affect the certification. The certification body decides whether additional audits must be performed outside the regular intervals.



Explanation: Major changes pertaining to VLOG certification include, e.g. change of risk category, other products and/or processes.

F 3.2 Contractual Binding of the Group Members (KO)

The group members must be bound to the retail group organiser by a contract/participation statement requiring compliance with the VLOG Standard and with the requirements and obligations of the individual group's risk management. By signing the agreement, members undertake to implement any corrective actions and deadlines as instructed by the group organiser. Each group member must sign the declaration of participation/agreement.

F 3.3 Risk Management (KO)

Risk analysis

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 (analogous to the HACCP concept).

The risk analysis includes at least:

- 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 (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

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

There must be an annual review of the risk management, including a review of the group description, e.g. as part of an internal audit.

F 3.4 Implementation of the Requirements for Sampling and Testing

Sampling and testing plan

The group organiser must submit a written sampling and testing plan for the group members that defines the risk-based sampling and GMO testing of the risk-prone feed in the business relevant for “ohne Gentechnik” production. The group organiser has to ensure compliance with the sampling and testing plan. The various production/processing technologies of the group members must be taken into account when generating the sampling and testing plan.

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

- A written documented risk analysis of the risk-prone feed used and, based on this, the determination of the risk-prone feed to be sampled/tested.
- 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
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the testing procedure (commissioned laboratory, scope of testing).

The sampling and testing plan is to be implemented according to schedule.

Test frequency

At minimum, the testing results required per Chapter E 4.9 must be submitted for each agricultural group member within the respective audit interval.

Evaluation of the analytical data

The group organiser must:

- collect the test results of the group members, and evaluates these at least once per year. These evaluations must be conducted for each group member.
- perform a supplier evaluation based on the evaluation results.
- define risk-based measures for the group members as applicable.

Handling of positive test results

In the event of positive GMO test results, the group organiser must derive (corrective) action in accordance with Annex V and Chapter F 3.6.



Explanation: If collective samples of feed are tested, the results may not be factored as test results pertaining to individual operations.

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

F 3.5 Training of Staff and Group Members by the Group Organiser

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. Training is to take place before they begin with their activity, as well as on an ongoing basis, and at least once a 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 “Ohne Gentechnik” production. Communication of the information is to be documented.



Explanation: Staff members of the group organiser involved in the operating processes of relevance to “VLOG” certification include, e.g. QM, Procurement etc.

F 3.6 Handling of Non-compliant Feed, Products and Animals (KO)

The group organiser must establish an effective and documented procedure handling non-compliant feed, products and animals. This includes at a minimum the following steps:

- 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.



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

F 3.7 Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback are to be evaluated in an appropriate 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 3.8 Goods Recall

An effective and documented procedure for goods recall, including definition of responsibilities, must be in place for non-compliant products according to the VLOG Standard.



Explanation: No goods recall procedure is needed for products and animals that cannot be taken back (e.g. raw milk, eggs).

F 3.9 Crisis Management (KO)

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

A new, 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” products. This procedure must be implemented and includes at least:

- Steps to take in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency numbers
- Provision requiring immediate notification of the VLOG head office using the VLOG Incident Sheet (cf. Annex XXXIII), of the certification body and of affected business partners and customers
- Legal advisement (if required)

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

F 3.10 Corrective Action / Continuous 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 timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

F 3.11 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: at least five years.



Explanation: Documents that must be retained are, e.g., delivery slips, supplier evaluations, training documents, etc.

F 3.12 Internal Audits

The group organiser is to perform annual internal audits which at a minimum must cover the general and business-specific Standard requirements for the Group Organiser stage organiser. 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.

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In the following part, the specific rules and requirements for the Food Stage and its sub-stages are described.

G 1 Stage Definition and Mandatory Certification

parts in
table
changed

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
<p>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.</p> <p>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).</p>			
Food of animal origin/ingredients	<p>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.</p> <p>For the retail trade, whenever preparation occurs in outlets, and bulk goods of animal origin are to be labelled with the “Ohne GenTechnik” seal (separate Standard Part G).</p>	No relevant areas	<p>G 1-G 3, G 5, J 1 if applicable</p> <p>H 1-H 3</p>
Plant-based food/ingredients	<p>For plant-based products which are to be labelled as “VLOG” or with the “Ohne GenTechnik” seal. and for which all of the following criteria have been met:</p> <ul style="list-style-type: none"> • The preparation/processing is done outside of Germany. • They consist of plant-based ingredients for whose species there is a GMO cultivation authorisation in a given country in the world. 	For plant-based products which are not to be labelled as “VLOG” or with the “Ohne GenTechnik” seal.	G 1-G 5, J 1

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
	For risk-prone plant-based products which are to be labelled as “VLOG” or with the “Ohne GenTechnik” seal and which are produced with plant-based ingredients for which there is a plausible risk of carryover/appearance of unapproved GMO variants (see Chapter G 5).		G 1- G 5, J 1
Food transport and trading in food is assigned to the Logistics stage. The checklist for the Logistics Stage (see Annex XIV) must be applied.			

G 2 Details of the Certification Procedure

G 2.1 Risk Grading

Risk Category 0 (There is no or only very low risk)

- As a matter of principle, businesses that process or store swappable GMOs on their premises cannot be graded as Risk Category 0.

Risk Category 1 (There is moderate risk)

- Businesses and process steps with 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” certification.

Risk Category 2 (High risk)

- Businesses and process steps 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” certification
- Test results from the audit period under consideration have indicated that the threshold value of 0.1% GMO per ingredient was exceeded; this resulted from the business' failing to take measures to avoid carryover.

G 2.2 Audit Frequency

Routine audits are to be carried out annually.

G 2.3 Knock Out (KO) Requirements

The following KO requirements have been determined:

- Risk management (G 3.3)
- Incoming goods inspection (G 3.5)
- Segregation of goods flows/exclusion of commingling and swapping (G 3.6)
- Handling of non-compliant raw materials/products (G 3.7)
- Inspection of outgoing goods/labelling on bills of lading (G 3.8)
- Traceability (G 3.9)
- Crisis management (G 3.12)

G 3 General Requirements

G 3.1 Facility Description

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

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



Explanation: Information provided in electronic form will be accepted. For the audit, the current facility descriptions, annexes, 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. This must be noted at the relevant part of the document, and data relevant to the certification process must be included in the facility description and/or checklist. 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.

Major changes pertaining to the certification include, e.g., changes in risk category, other products and/or processes.

G 3.2 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.

G 3.3 Risk Management (KO)

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 (5, EGGenTDurchfG for the “ohne Gentechnik”/“VLOG” area (incl. 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 (certifications, agreements, reliability etc.)
- Other business-specific items as necessary

Risk management

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

G 3.4 Commissioning External Service Providers

If VLOG certified businesses commission external, non-VLOG certified service providers with activities subject to certification in the areas of food processing / food preparation, transport, storage, handling

and/or trade, these entities are to be included in the risk management (see Chapter G 3.3) and must comply with the requirements of Chapter A 3.2.1.

G 3.5 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 (see Chapter A 1.3.2 and A 1.4).

A complaint is to be issued to the supplier for incomplete bills of lading. 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 used²².

- The bills of lading are to be checked for the “VLOG” label within the scope of incoming goods processing.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

Certification under a standard recognised as equivalent may be presented as an alternative to VLOG certification.

Incoming goods inspection of ~~certified~~ raw materials/products of non-animal origin:

For all raw materials not of animal origin, the supplier must submit:

- a GMO-Free Certificate according to the VLOG “Ohne Gentechnik” Production and Certification Standard (Annex I).

The business is to verify once per year, in an expedient manner, whether the certification in the issued form is still valid and whether the specification for the article remains unchanged.

For all VLOG-certified raw materials and products of non-animal origin:

- The bills of lading are to be checked for the “VLOG” label within the scope of incoming goods processing.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.



Explanation: For non-VLOG certified raw materials/products not of animal origin, in addition to the supplier certification, a note and/or clear contractual provision may be included in the bill of lading.

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.”

²² Honey or other apiculture products that are not certified under the VLOG Standard or Council Regulation (EC) 834/2007 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.

G 3.6 Segregation of Goods Flows/Exclusion of Commingling and Swapping (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. 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.



Explanation: If animals are fed in slaughterhouses (e.g. due to longer wait times) it must be ensured that the utilised feed is not subject to compulsory labelling according to Regulation (EC) No. 1829/2003 or 1830/2003.

G 3.7 Handling of Non-compliant Raw Materials/Products (KO)

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

This includes at a minimum the following steps:

- 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.



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

G 3.8 Inspection of Outgoing Goods/Labelling on Bills of Lading (KO)

VLOG certified raw materials and products must be clearly labelled on all bills of lading or in the case of packed goods, on the packaging, using the wording “VLOG” and/or the “Ohne GenTechnik” seal (see Chapter A 1.2.1). It must be clearly evident to which raw materials/products the labelling refers.

If no waybills/bills of lading are produced due to the nature of the system (e.g. milk collection), an unequivocal contractual regulation is to be made concerning delivery which ensures the above-mentioned labelling.



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." For advertisement and placement on the German market, only the use of the words "ohne Gentechnik" is permitted.

G 3.9 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 goods flows and their plausibility.



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 3.10 Complaint Management

A documented system is to be introduced to address complaints and feedback associated with the requirements of the VLOG Standard. The complaints and feedback 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.

G 3.11 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 3.12 Crisis Management (KO)

A new, 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" raw materials/products. This procedure must be implemented and includes at least:

- Steps to follow in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers

- Provisions requiring immediate notification of the VLOG head office using the VLOG Incident Sheet (see. Annex XXXIII), of the certification body and of affected business partners and customers
- Legal advice (if required)

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

G 3.13 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 corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

G 3.14 Documentation and Retention Period

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

All documents relating to “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 + 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 3.15 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 at least once a 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.

G 3.16 Internal Audits

The business must perform annual internal audits that at a minimum cover 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 4 Specific Requirements for Plant-Based Raw Materials

G 4.1 Sampling and Testing

Risk-based sampling and GMO testing of raw materials and products relevant for “ohne Gentechnik” products is to be performed according to the following statements.

G 4.1.1 Sampling and Testing Plan

A written sampling and testing plan must be available that describes the sampling and testing procedure.

The sampling and testing plan, in compliance with the requirements listed in Part J, 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
- changed
- Determination of the parameters to be tested (see Guideline for Laboratories)
- Description of the test procedure (commissioned laboratory, scope of testing)

The sampling and testing plan is to be implemented according to schedule.

Sampling and GMO testing can be reduced if the utilised raw materials and products are not risk-prone and/or cannot be tested for genetic engineering for technical reasons.

In this case, a risk analysis must be in place as the basis for developing a sampling and testing plan that includes at least the following criteria for all raw materials/products utilised in “Ohne Gentechnik” 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
- Commingling and/or carryover 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:

http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Suitability_of_GMO_Analysis_for_Feed_Raw_Materials_and_Foods.pdf

G 4.1.2 Frequency of Sampling and Testing

The business must carry out the sampling and testing frequency listed in Table 9 annually, at minimum.

Based on the risk analysis produced in accordance with Chapter G 4.1.1, 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.

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

Risk category	Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods
0	2 x per year
1	6 x per year
2	12 x per year

Table 9: Annual minimum number of samples/tests of “ohne Gentechnik” incoming goods



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 9. Furthermore, batch-related test results from a VLOG-recognised laboratory can be counted toward the minimum number of incoming goods tests required in Table 9.



Explanation: Raw materials/products that are certified according to VLOG or another standard recognised as equivalent do not need to be sampled and tested.

G 4.1.3 Handling of Positive Test Results

Positive test results are to be treated according to Annex VI.

The affected raw materials and products present in the business are to be handled as outlined in Chapter G 3.7.

G 5 Specific Requirements for Risk-Prone Raw Materials/Ingredients

Specific requirements for risk-prone raw materials (e.g. rice, salmon) are to be determined outside the VLOG Standard in the document Risk-Prone Raw Materials/Ingredients. The overview is to be updated regularly based on risk: [http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further Documents/Specific Requirements for Risk-Prone Raw Materials - Ingredients.pdf](http://www.ohnegentechnik.org/fileadmin/ohne-gentechnik/das_siegel/og-standard_english/Further_Documents/Specific_Requirements_for_Risk-Prone_Raw_Materials_-_Ingredients.pdf).

G 6 Specific Requirements for Transport, Storage, Handling and/or Trading

If the business performs activities in the area of transport, storage, handling, trading and/or drop shipping of food that are subject to the certification obligation, the relevant requirements according to Part B must be followed. The checklist for the Logistics Stage (see Annex XIV) must be applied.

Part H: Retail Stage – Sale of Bulk Food of Animal Origin

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In the following section, the requirements for the sale of bulk food of animal origin in retail is described, the certification of which is done within the scope of retail group certification. At the request of businesses or certification bodies to VLOG, the requirements for individual certification of businesses at this stage will be published.

H 1 Stage Definition and Mandatory Certification

Sub-stage	Certification required according to VLOG Standard	Certification not required according to VLOG Standard	Standard requirements
Retail: Handling and/or preparing/processing of food and its storage at the point of sale and delivery to the final consumer.			
VLOG retail group: A VLOG retail group is a combination of branch operations (the so-called retail group members) for the purpose of VLOG group certification in retail.			
Retail group organiser, hereinafter group organiser: Business in a VLOG retail group having responsibility for a risk management that includes the retail group members. In VLOG retail group certification, certification is to be issued through the retail group organiser, i.e. the group organiser receives the certification for the VLOG retail group.			
Retail group member, hereinafter group member: Branch/site contractually integrated into a VLOG group.			
	For bulk goods of animal origin at a central distribution facility and counter sales, labelled with the “Ohne GenTechnik” seal	No relevant areas.	H 1-H 3

H 2 Details of the Certification Procedure

H 2.1 Conditions and Requirements for Retail Group Certification

- Contract between the group organiser and a VLOG recognised certification body
- Signed Standard Usage Agreement between the group organiser and VLOG²³



Explanation: The VLOG group sells a very high portion of its bulk “VLOG” food (at least 90% of the products) to end consumers. If this is not the case, the VLOG requirements for food processing / preparation (see Part G) must also be taken into account within the business and in the VLOG certification.

H 2.2 Certification Process

Group certification is to be performed in accordance with the following steps.

- Application for certification made to a VLOG recognised certification body and submission of the group description (see Chapter H 3.1)
- Audit planning by the certification body with the group organiser according to Chapter A 3.6 (scope, date/time, duration of audit)
- Auditing of the retail group organiser and the retail group members in accordance with Chapter A 3.7 by the auditor, including evaluation of the requirements in accordance with Chapter A 3.9
- Audit evaluation/review by the certification body in accordance with Chapter A 3.9.2
 - including confirmation/correction of the audit result
 - including confirmation of the approved retail group members
- certification of the VLOG retail group in accordance with Chapters H 1 to H 2.2.4.

H 2.2.1 Audit Intervals and Scope of the Audit

The group organiser is responsible for and monitors the compliance with audit dates and the implementation of corrective measures by the group members.

Initial certification

The certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

- 10% of the group members per year if “Ohne Gentechnik”/“VLOG” food is centrally purchased
- 100% of the group members if the “Ohne Gentechnik”/“VLOG” food may be purchased locally by the branches.

²³ Known as “Certification Agreement” until 20 June 2017.

Follow-up Certification

The certification body is to perform an annual audit of the group organiser and audits group members according to the following random sampling scheme:

- 10% of the group members per year if “Ohne Gentechnik”/“VLOG” food is centrally purchased
- 100% of the group members if the “Ohne Gentechnik”/“VLOG” food may be purchased locally by the branches.



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

H 2.2.2 Effect of Audit Results on Labelling and Marketing

- If, due to the audit results, the certification of the VLOG group is suspended or revoked, the labelling of products with “ohne Gentechnik” is not permitted for the entire VLOG group.
- Marketing of “VLOG” food may continue to be done by the retail group if individual retail group members are excluded from the group. In this case, “VLOG” marketing or marketing with the “Ohne GenTechnik” seal is no longer permitted only for the excluded group members.

H 2.2.3 Certificate Issuance

The certificate is to be issued to headquarters for the “bulk goods” area of application in accordance with Chapter A 3.11. The VLOG certificate must also indicate the category of products (e.g., poultry meat, cheese). The participating branches must be listed in an annex to the certificate.

The group organiser is to report changes to the list of members promptly to the certification body. It is the responsibility of the certification body to decide whether additional audits must be carried out.

For the Retail group certification, the member list must contain, for each branch:

- The last routine audit date.

H 2.2.4 Distribution of the Audit Report

For each audit, the group organiser and/or the audited group member are to receive an audit report including any deviations found and measures to be implemented.



Explanation: The audit report of the group members is to be distributed to the group members via the group organiser or sent to them directly, depending on what was agreed beforehand.

H 2.3 Commissioning of Multiple Certification Bodies

If the group organiser commissions more than one certification body with auditing the group members:

- 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)
- The groups must be organised such that each certification body independently audits 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 at the headquarters or at the retail 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.

H 2.4 Knock Out (KO) Requirements

- Contractually binding of the group members (H 3.2)
- Risk management (H 3.3)
- Incoming goods inspection (H 3.5)
- Segregation of goods flows/exclusion of commingling and swapping (H 3.6)
- Handling of non-compliant raw materials/products (H 3.9)
- Traceability (H 3.11)
- Crisis management (H 3.12)

H 3 Requirements for Group Organisers and Group Members

H 3.1 Group Description

The group organiser must submit a current group description to the certification body when applying for 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”.
- An overview of all sites and branches, including any outsourced warehousing or production processes
- Persons in charge of the group certification at the retail group organiser, including the persons' contact information and provisions regarding deputies
- List of products: Overview or specifications for bulk “ohne Gentechnik” goods offered by the business, including consideration of re-working
- 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
- A list and description of the activities of the subcontractors/contract processors/outsourced processes, 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.) For further processing of bulk “ohne Gentechnik”/“VLOG” goods and the use of further ingredients which are not purchased from VLOG certified suppliers (e.g. marinades, mixed spices), a list of all formulations with quantity- or weight-related information on “ohne Gentechnik” ingredients and components, including consideration of re-work
- List of all authorised suppliers of “ohne Gentechnik”/“VLOG” food/ingredients

The retail group description must be kept up to date by the group organiser. The group organiser must promptly notify certification body of internal changes in the business pertaining to the certification. The current retail group description must be available at the retail group organiser and the retail group members.

For the audit, the updated group description, annexes, and documents listed therein must be submitted to the auditor for review. The current product and member list must be submitted to the auditor for further processing at the certification body and forwarding to VLOG.

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



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, regularly updated and available at the respective group member. 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 3.2 Contractual Binding of the Group Members (KO)

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

- Compliance with the VLOG Standard
- The requirements and obligations of the individual group's risk management

The contract (participation statement) must be signed by the group member.

H 3.3 Risk Management (KO)

Risk analysis

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

The risk analysis includes at least:

- Raw materials and products for the “Ohne Gentechnik”/“VLOG” area
- Handling of raw materials and products that meet the requirements for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal, and raw materials and products that do not meet the requirements for “VLOG” labelling or labelling with the “Ohne GenTechnik” seal

- Cleaning and disinfection procedure
- Suppliers (certifications, agreements, reliability etc.)
- Sales/Declaration
- Other business-specific items as necessary

Risk management

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

There must be an annual review of the risk management, including a review of the group description, e.g. as part of an internal audit.



Explanation: If further ingredients (e.g. marinades) not procured from VLOG certified suppliers or suppliers certified in accordance with another equivalent standard are added to the bulk “ohne Gentechnik”/“VLOG” goods in the branch, the risk analysis must be expanded to assess the possibility of the use of flavourings, enzymes, microorganisms, additives, auxiliary substances, and other food ingredients, based on certificates provided by the suppliers. A template of a correct certificate confirming the GMO-free status of a product is included in the VLOG Standard, see Annex I. The use of raw materials of animal origin is only permissible if they are certified under the VLOG Standard or a standard recognised to be equivalent.

H 3.4 Procurement (Suppliers and Producer Certification)

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 articles
- Specifications

The abrogation of documentation and retention periods for formulations/formulation changes must be approved by a manager at the facility.

H 3.5 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 (see Chapter A 1.3.2 and A 1.4).

- A documented check of the “VLOG” label is to be performed on packaging and delivery slips and/or invoices.
- The Supplier's certification is to be checked.
- The VLOG certification of the supplier is to be checked periodically, the minimum being once annually.

H 3.6 Segregation of Goods Flows/Exclusion of Commingling and Swapping (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 not 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.



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.

Segregation measures, interim cleaning stages and production sequences are to be defined and implemented in a risk-oriented manner in the risk management.

H 3.7 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 3.8 Training of Staff and Group Members by the Group Organiser

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. Training is to take place before they begin with their activity, as well as on an ongoing basis, and at least once a 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 “Ohne Gentechnik” production. Communication of the information is to be documented.



Explanation: Staff members of the group organiser involved in the operating processes of relevance to “VLOG” certification include, e.g. QM, Procurement etc.

H 3.9 Handling of Non-compliant Raw Materials/Products (KO)

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

This includes at a minimum the following steps:

- 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

Responsibilities are to be defined in the procedure.

H 3.10 Labelling

Price tags and/or product labels must bear the mention “ohne Gentechnik” or the “Ohne GenTechnik” seal.

H 3.11 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 goods flows and their plausibility.



Explanation: The following data is to be collected to this end:

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

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 3.12 Crisis Management (KO)

A new, 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” raw materials/products. This procedure is to be implemented, must take into account all branches, and has to comprise, at a minimum:

- Steps to be taken in the event of an incident
- Assigned responsibilities including substitute rules
- Availability (within and outside of business hours)
- List of emergency phone numbers
- Provisions requiring immediate notification of the VLOG Head Office using the VLOG Incident Sheet (cf. Annex XXXIII), of the certification body and of affected business partners and customers
- Legal advice (if required)

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

H 3.13 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 corrective actions to prevent their reoccurrence.

The timely implementation of corrective actions is to be monitored and their effectiveness reviewed within a reasonable period. Both are to be documented.

H 3.14 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: at least two years.



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

H 3.15 Internal Audits

The group organiser must perform annual internal audits in the business of the group organiser and all branches. At a minimum, these audits must cover all general and business-specific 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, annually or per branch, at least two risk-based random sample checks are to be performed 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

Part I: Requirements for Certification Bodies, Auditors, Evaluators and Certifiers

The requirements for certification bodies, auditors, evaluators and certifiers have been removed from the “Ohne Gentechnik” Production and Testing Standard and now appear in the “Guideline for Certification Bodies, Auditors, Evaluators and Certifiers” instead

Part J: Requirements for Laboratories and Tests

The requirements for VLOG laboratories (previously Chapters J2-J3) have been removed from the “Ohne Gentechnik” Production and Testing Standard and now appear in the “Guideline for Laboratories” instead.

J 1 Requirements for Commissioning a Test	123
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J 1 Requirements for Commissioning a Test

The client commissioning the GMO test undertakes:

- To check the VLOG recognition of the commissioned laboratory regularly, at least once per 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 mash, soy as soy extraction meal). Copies of the bills of lading/declarations are to be sent to the laboratory along with the samples.

Glossary: Definition of Terms

The following definitions and abbreviations are provided for simplification:

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 ISO/IEC 17065.

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

Business: The administrative seat of a member operation. A general organisation which may consist of multiple sites/operating units.

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 3, 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.

Conventional quality, products and raw materials: Not usable in the “ohne Gentechnik” process.

Conversion of feed materials to “VLOG geprüft” quality: Through incorporation

- into the VLOG certification,
- into a business' internal risk management and
- in particular, into a GMO monitoring system in accordance with Chapter C 3.3

purchased feed materials can attain “VLOG geprüft” quality at a feed dealer's. Feed materials can also be processed (e.g. shredded, milled, pelleted).

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.

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; however, it is the party with whom the customer has a contractual relationship and who 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. 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.

Facility: Legally independent businesses with one or several sites.

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

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”.

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.

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).

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 or branch/facility contractually integrated into a VLOG group.

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 activities directly related to the movement of goods in transit (unloading, interim storage, if applicable, as well as reloading of goods being transported).

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.

KO criterion: A requirement which has a critical effect on “ohne Gentechnik”/ “VLOG geprüft” labelling in case of non-compliance.

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. Mobile grinding and mixing devices come under the category of logistics businesses as well.

Lot: See batch.

Matrix member: Business which is contractually integrated into a VLOG matrix.

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 (see 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” 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 operation 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 operations 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): within the meaning of Sec 5 (2), Food Labelling Regulation (LMKV) in the version dated 18 December 2007.

Outsourcing: Outsourcing takes place if the outsourcing laboratory is not accredited for the parameter.

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

Positive test result: Any test result that confirms the presence of GMOs. That does not automatically mean that the feed, raw material or product cannot be used in “VLOG geprüft” or “ohne Gentechnik”

production. The applicable limit values and conditions of EU Regulations 1829/2003 and 1830/2003 and EGGenTDurchfG must be followed for this classification (see Chapters A 1.3.1 and A 1.3.2).

Private Labelling: 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 private labeller's specifications or the goods are purchased from the manufacturer and sold in the Private Labeller's name.

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).

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" (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: 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 carryover 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 (see Chapter C 3.3).
- For the Agricultural Stage, Chapter E 4.9.1 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.
- Upon request, the VLOG will provide a definition of the main production focus of small agricultural operations that are not mentioned here.

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 on behalf of a third party or storage in one's own external warehouses.

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 – not produced at one's own facilities – and resold, including import and drop shipping. In contrast to drop shipping, the trader takes possession of the goods and owns 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.

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

VLOG group: A VLOG group is an association of agricultural businesses or retail sites/branches (the group members) for the purpose of VLOG group certification.

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

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 operations which

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

Annexes

Part 1 Suppliers' Declarations

- I. GMO-Free Certificate According
- II. Certificate for “ohne Gentechnik” Compliant Feeding of Animals
- III. Sample Delivery Slip for Slaughterhouse Deliveries (Delivery Slip and Standard Declaration in accordance with Annex 7)

Part 2 Analytics

- IV. Sampling Log
- V. Handling of Positive Test Results (feed)
- VI. Handling of Positive Test Results (food)
- VII. Reduction of the Scope of Testing after Changing Feed in Group Organisations

Part 3 Certification

- VIII. VLOG Group Certification Process at the Agriculture Stage
- IX. VLOG Matrix Certification Process Logistics and Feed Manufacturing
- X. Sanctions Catalogue
- XI. VLOG Certificate Template
- XII. Areas of Application of VLOG Certification

Part 4 Audit Documents

- XIII. Facility Description Logistics
- XIV. Checklist Logistics
- XV. Facility Description Feed Manufacturing
- XVI. Checklist Feed Manufacturing
- XVII. Facility Description Mobile Grinding and Mixing Facilities
- XVIII. Matrix Description and List of Sites
- XIX. Checklist Matrix Organisation
- XX. Facility Description Agriculture
- XXI. Facility Description Animal Transport/Livestock Trade
- XXII. Checklist Agriculture including Animal Transport and Livestock Trade
- XXIII. Group Description Agriculture including Members List
- XXIV. Checklist Group Organisation
- XXV. Facility Description Food Processing / -Preparation
- XXVI. Checklist Food Processing / -Preparation
- XXVII. Group Description Retail – Bulk Goods
- XXVIII. Checklist Retail – Bulk Goods

Part 5 Protocols and Confirmations

- XXIX. Grinding and Mixing Protocol
- XXX. VLOG Ereignisfallblatt Futtermittelherstellung and -logistik
- XXXI. VLOG Ereignisfallblatt matrix organiser
- XXXII. VLOG Ereignisfallblatt Landwirtschaft and Viehhandel
- XXXIII. VLOG Ereignisfallblatt Gruppenorganisation Landwirtschaft
- XXXIV. VLOG Ereignisfallblatt Lebensmittelverarbeitung, -logistik and Einzelhandel

Literature

- Guideline for the Control of GMOs in feed (German: Leitfaden zur Kontrolle von GVO in Tierfutter – version of November 2011). Monitoring of the production, of handling, of use and of bringing to market of feed in connection with genetically modified organisms (GMOs). Policy guidelines for the implementation of legal regulations. 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 Federal Government and The Association of German Agricultural Investigation and Research Institutions (VDLUFA) – also available in English
- Sampling of feed for the test of GMO components authorised in the EU within the framework of an examination of compulsory labelling; compiled by the Working Group PCR Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes (VDLUFA), dated July 2010 – available in German only
- Concept of test of genetically modified feed. Working paper of the Working Group PCR Analytics of the Feed Expert Group of the Association of German Agricultural Analytic and Research Institutes (VDLUFA), dated February 2011 – available in German only
- Praxishandbuch “Bio-Produkte ohne Gentechnik” (Practical Handbook “Organic Products without Genetic Engineering” – in German – from the German Association of Organic Farmers, Food Processors and Traders (Bund Ökologische Lebensmittelwirtschaft – BÖLW), Ökoinstitut and the Research Institute for Biological Agriculture (Forschungsinstitut für biologischen Landbau – FiBL. <http://boelw.de/themen/gentechnik/bioxgen/> - available in German only
- Legal opinion (17 pages, in German) by [GGSC], a Berlin law firm commissioned by VLOG, dated 23 November 2015 http://www.ohnegentechnik.org/ggsc_stellungnahme_fuetterungsfrist/ - available in German only

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.

VLOG Guideline

for Dealing with Violations

1 General

This Guideline serves as the basis for dealing with violations of the rules and requirements of Verband Lebensmittel ohne Gentechnik e.V. (hereinafter “VLOG”). The following user groups are contractually obliged to comply with the VLOG requirements.

- Sub-licensees for the “Ohne GenTechnik” seal
- Licensees for the “VLOG geprüft” seal
- Businesses certified according to the VLOG Standard (bound by the Standard Usage Agreement)
- VLOG-recognised certification bodies as well as auditors, evaluators and certifiers involved with them
- VLOG-recognised laboratories

This Guideline exclusively applies to violations that occur after its effective date.

2 Establishing Violations

Breaches of contractual agreements with VLOG and violations of VLOG Standard requirements can be established based on external information, regular VLOG audits or Integrity Audits, evaluations, or document reviews by the head office as well as in other ways.

The head office will promptly respond to information about possible violations by reviewing the necessary documents and requesting any appropriate statements, and/or ordering additional controls and reviews.

If there are indications of an actual violation, the head office will request a statement from the party involved within a brief, prescribed response period.

The internal process must be documented.

Possible violations include:

- Violations of the EC Genetic Engineering Implementation Act (EGGenTDurchfG) by sub-licensees
- Violations of the VLOG Standard by sub-licensees and licensees
- Violations of the VLOG Standard and the Guideline for Certification Bodies, Auditors, Evaluators and Certifiers by certification bodies or auditors, evaluators, and certifiers
- Breaches of other obligations of licensees, sub-licensees and certification bodies that are contractually stipulated (e.g. providing sales figures, paying licence fees, forwarding auditor documents, etc.)
- Violations of the VLOG Standard and the Guideline for Laboratories by laboratories

3 Dealing with Violations

If the information about a violation is confirmed, the head office will determine the severity of the violation with the aid of the violation classification keys in each user group (hereinafter “Classification Key”) and take

appropriate action. Independent personnel¹ at the head office will objectively evaluate violations and determine penalty actions.

Assignment of the Penalty Committee²

The head office will convene the Penalty Committee in the following cases:

- If stipulated by the Classification Key
- In cases that cannot be clearly classified by the head office
- In the event of disputed facts or if a business complains about the evaluation of a violation.

To facilitate scheduling, the head office will notify the Chair of the Penalty Committee of the penalty case as quickly as possible.

The VLOG head office will notify the affected contract partner of the involvement of the Penalty Committee. Contract partners who wish to provide new information, in addition to the statement made when the violation was found (see section 2), will have five business days after notification of the Penalty Committee involvement to respond to the charges and make a statement to the head office.

After receipt of the statement, the head office will provide the Penalty Committee with all necessary information and documentation and make itself available for questions.

Once the case has been transferred to the Penalty Committee (including the necessary information and the contract partner's statement, if any), the Penalty Committee will make a decision within 10 business days. To save time, the Penalty Committee may also discuss the case by telephone or video conference.

Decisions of the Penalty Committee

The decisions of the Penalty Committee are binding. In cases of particular relevance to licensing, the head office and/or the Management Board must be heard before establishing the penalty. Management Board members who are directly affected by the case or otherwise biased will be excluded from consultation and have no voting rights. The head office will immediately forward Penalty Committee decisions to the VLOG Management Board for informational purposes. Once the Penalty Committee has provided a written rationale for its decisions, the head office will execute the determined actions.

4 Classification of Violations

The nature and severity of the violations are described in the Classification Keys, which serve as guidance for the head office or the Penalty Committee.

Independent personnel¹ at the head office will objectively evaluate violations and determine penalty actions.

The penalties and maximum amounts of contractual fines will be based on the "Schedule of Penalties".

In cases where the Penalty Committee was not involved, but examination of the violation by the head office results in withdrawal of the right to use a licence, the VLOG head office will avail itself of the legal expertise of the Penalty Committee.

¹ Employees who were not involved in verifying the violation. For example, this excludes the relevant Integrity Auditor.

² For additional information, cf. section 6

5 Handling and Monitoring of Penalty Actions

The head office will give the contract partner or the member prompt written notice of any further procedures (e.g., required actions, penalties, fines, etc.). If necessary, the head office will also conduct chargeable checks/audits.

The head office is permitted to inform other contract partners or members about the violation and the actions taken. In particular, this will apply to cases involving:

- withdrawal of a licence to use the “Ohne GenTechnik” or “VLOG geprüft” seal or
- incidents or penalties affecting the supply chain.

The costs incurred in connection with the penalty procedure, such as the Chair’s working hours, the Committee members’ travel expenses, a flat fee for expenses incurred for the head office’s work and the costs of experts, is to be borne by the penalised business.

6 Complaint and Appeal Proceedings

Within the context of the penalty procedure, all contract partners have the right to file a complaint or appeal with respect to the violation evaluation to the head office (sanktionen@ohnegentechnik.org). The head office will confirm the receipt of the complaint or appeal and the involvement of the Penalty Committee within five business days. The Penalty Committee will render decisions on complaints and appeals (cf. section **Fehler! Verweisquelle konnte nicht gefunden werden.**). The head office will then inform the contract partner of the Penalty Committee’s decision.

Following the Penalty Committee’s evaluation of a complaint or appeal from a penalised business, VLOG or the business, as stipulated by the Penalty Committee, will bear the costs incurred in connection with the penalty procedure (such as the Chair’s working hours, the Committee members’ travel expenses, a flat fee for expenses incurred for the head office’s work and the costs of experts), as follows:

- If the business complaint with respect to the violation evaluation is successful, there is no violation by the business and VLOG will assume the cost of the penalty procedure.
- If the business complaint with respect to the violation evaluation is partially successful, i.e. the violation is less serious, VLOG will assume a prorated share of the costs at its good-faith discretion based on the decision of the Penalty Committee, taking the fact into account that the complainant partially prevailed.
- If the business’s complaint is unsuccessful or it is decided that the violation is more serious than originally assumed, the penalised business will assume the cost of the penalty procedure.

7 Penalty Committee

The Penalty Committee is appointed as a neutral body. The Penalty Committee comprises selected representatives of the user groups integrated into VLOG and an attorney designated by the head office. The Committee will always consist of five persons: an attorney (Chair) and one business representative from each of the following areas: the feed industry, the food processing industry and the food retailing industry, as well as a representative of a VLOG-recognised certification body.

If the Penalty Committee is deciding a case, the person from the industry involved will have no voting rights. In the food processing area, voting rights will only be void if the case to be decided relates to the same product group.

The head office will select Penalty Committee members from a pool of potential Penalty Committee participants based on their expertise, independence, and availability with respect to the violation to be addressed. There is a substitution rule in case the Chair is unable to attend.

The Chair of the Penalty Committee may consult external experts as necessary, but the associated costs must be clarified with the head office in advance.

The Penalty Committee will work on a voluntary basis, except for the attorney. Committee member expenses, such as travel expenses, will be reimbursed by VLOG.

The Penalty Committee has a quorum if the attorney and at least three additional members are in attendance.

The Penalty Committee will render its decisions by simple majority vote. In the event of an impasse (i.e., a tied vote), the Committee Chair's vote will count as two votes. Written minutes must be kept, which at a minimum must include the names of the participants, the decision with a rationale and a list of the documents utilised to make the decision. The approved minutes are to be promptly sent to the head office.

Penalty Committee members are subject to confidentiality obligations, both during and after the conclusion of their activities for the Penalty Committee. Confidentiality obligations must be set forth in a non-disclosure agreement.

Classification of Violations by Certification Bodies

Minor violations

- Tardy submission of audit and certification documents to VLOG (more than eight weeks after the audit date).
- Faulty and/or incomplete submission of audit and certification documents.
- Issuance of a VLOG certificate without the conclusion of a Standard Usage Agreement or presentation of a VLOG ID.
- Incorrect risk grading of a business by reducing the risk category by one level, despite sufficient audit documentation of on-site conditions.
- Issuance of a VLOG certificate that fails to meet the requirements of the VLOG Standard (e.g., indicating the wrong stage or scope of application). Editorial errors are not considered violations.
- Failure to note errors in the facility description (e.g., incorrect print number, missing list of relevant service providers, missing documentation of risk category).
- Failure to notify VLOG of expiring or terminated contracts with VLOG customers.
- Issuance of a certificate more than eight weeks after the audit date without conducting a new regular audit
- Certification body fails to notify VLOG promptly of disqualifying a VLOG business or report is slightly delayed (max. five business days).
- Certification body holds internal VLOG training with a slight delay (max. four weeks).
- One-time failure to participate in the annual VLOG certification body meeting.

Significant violations

- Occurrence of more than two minor violations within one year.
- Incorrect risk grading of a business by reducing the risk category by two levels, despite sufficient audit documentation of on-site conditions.
- Improper action by the certification body (e.g., failure to implement four-eyes principle in certifying audit documents).
- Incorrect evaluation/assessment by the certification body and/or the auditor (e.g., use of a non-VLOG-recognised laboratory, insufficient sampling and test plan).
- Certification body's independence and objectivity are compromised with respect to certain areas/aspects (e.g., certification body and/or its staff (including auditors) has/have a business relationship (except for certification) or a family/private relationship with the audited business).
- Late notification (by more than six business days) or failure to notify VLOG of a disqualification (K.O.).
- Issuance of VLOG certificates with an overly long duration.
- Inaccurate data regarding certification body staff (auditors, evaluators, certifiers) (e.g., faulty audit list).
- One-time use of auditors, evaluators or certifiers who lack adequate qualifications.

- Certification body fails to hold internal VLOG training or conducts training significantly past the deadline (by more than four weeks).
- Auditor conducts more than three regular VLOG audits of the same business in a row.
- Auditor conducts VLOG audits of a business for which he provided consulting services within the last two years.
- Certification body fails to cooperate with the VLOG Integrity Programme (e.g., provision of inadequate information or documentation). Certification body fails to submit a statement regarding a violation on time or only responds after a repeated request.
- Certification body fails to meet individual requirements, as set forth in the Guideline for Certification Bodies, Auditors, Evaluators and Certifiers, for the implementation of VLOG certifications in the quality management system.
- Failure to take corrective action within the established time period after a minor violation.
- Repeated failure to participate in the annual VLOG certification body meeting.

Major violations

- Occurrence of more than two significant violations within one year.
- Repeated use of auditors, evaluators or certifiers who lack adequate qualifications.
- Wilful or grossly negligent violation of VLOG auditing and certification rules (e.g., certification outside the VLOG Standard's scope of application).
- Certification body deliberately manipulates audit reports, test reports or documents (e.g., use of an auditor who lacks qualifications and of the documentation for a different auditor with adequate qualifications in the audit documents; inaccurate CVs for auditors, certifiers, and evaluators).
- Certification body jeopardises compliance with laws and accurate advertisement of VLOG products/feeds with faulty evaluation/assessment.
- Failure to conduct an on-site facility inspection during a VLOG regular audit of a business.
- Use of incorrect Standard documents, which affects the certification decision (e.g., incorrect version of the Standard, incorrect version of the checklist).
- Certification body denies access to its business offices for VLOG employees on an announced Certification Body Integrity Audit day, even though the auditor and the date of the audit were announced at least two weeks in advance.
- Repeated rejection of persons proposed by VLOG for Witness Integrity Audits.
- Certification body fails to notify VLOG of its loss of accreditation under ISO/IEC 17065.
- Certification body fails to meet multiple requirements, as set forth in the Guideline for Certification Bodies, Auditors, Evaluators and Certifiers, for the implementation of VLOG certifications in the quality management system.
- Certification body fails to take corrective action after a significant violation.
- Certification body fails to take corrective action after a major violation.

The above-listed violations are intended to serve as guidance in evaluating and classifying violations not mentioned here. The four-eyes principle will be used to assess and categorise violations.

Classification of VLOG Auditors' Violations

Minor violations

- Auditor fails to document deficiencies or deviations of the audited business or does so inadequately (e.g., insufficient sampling and test plan).
- Auditor grades certification audit items with an "A" in at least three cases within one year, even though they verifiably should have resulted in a deviation.
- Auditor fails to note significant errors in the facility description (e.g., incorrect print number, missing list of relevant service providers) and doesn't document them in the audit report.
- Auditor reduces the risk category of a business by one level and fails to document on-site business conditions that are relevant to risk grading.

Significant violations

- Occurrence of more than two minor violations within one year.
- Auditor fails to document major deficiencies or deviations of the audited business or does so inadequately (e.g., use of a non-VLOG-recognised laboratory).
- Auditor's independence and objectivity are compromised (e.g., the auditor has a business and/or family/private relationship with the audited business).
- Auditor lacks the necessary qualifications at the time of the audit.
- Auditor conducts VLOG audits of a business for which he provided consulting services within the last two years.
- Auditor fails to cooperate in VLOG Integrity controls (e.g., inadequate provision of information or documentation).
- Auditor fails to submit a statement regarding a violation on time or only responds after a repeated request.
- Auditor fails to take corrective action after a minor violation.

Major violations

- Occurrence of more than two significant violations within one year.
- Wilful or grossly negligent violation of VLOG auditing and certification rules.
- Auditor deliberately manipulates audit reports, test reports or documents (e.g., inaccurate CVs; specification of unrealistic audit times; no on-site facility inspection, but inspection is documented on the checklist).
- Auditor jeopardises compliance with laws and accurate advertisement of VLOG products/feeds with faulty evaluation/assessment.
- Auditor fails to take corrective action after a significant violation.
- Auditor fails to take corrective action after a major violation.

The above-listed violations are intended to serve as guidance in evaluating and classifying violations not mentioned here. The four-eyes principle will be used to assess and categorise violations.

Schedule of Penalties for Certification Bodies' Violations

VLOG penalty actions are always a case-by-case decision.

1 Types of Violations

Violations of VLOG rules and VLOG Standard specifications are divided into three levels of severity:

- minor violations
- significant violations
- major violations

1.1 Minor violations

If a minor violation is found, the VLOG head office will issue a written warning with a request to take all necessary actions to avoid a recurrence.

No penalty points are assessed for minor violations; however, the third and every additional minor violation within a year will be considered significant violations under section 1.2 (even if they are different violations). The legal consequences set forth in section 1.2 will apply.

1.2 Significant violations

If a significant violation is found, the VLOG head office will issue a written warning with a request to take all necessary actions to avoid a recurrence. Evidence of compliance must be presented to the VLOG head office in a timely manner (e.g., by submitting a training certificate, evidence of updated internal requirements, etc.). In addition, one penalty point will be assessed. The third and every additional significant violation within a year will be considered major violations under section 1.3 (even if they are different violations). The legal consequences set forth in section 1.3 will apply.

1.3 Major violations

If a major violation is found, the VLOG head office will issue a written with a request to take all necessary actions to avoid a recurrence. Evidence of compliance must be presented to the VLOG head office in a timely manner (e.g., by submitting a training certificate, evidence of updated internal requirements, etc.). In addition, three penalty points will be assessed.

Table 1: Consequences of minor, significant, and major violations

Type of violation	Penalty action (examples)	Penalty points per violation	Penalty action in case of recurrence (within one year)
Minor	Written Warning	0	From the 3rd minor violation, violations (warning) are classified as significant violations.
Significant	Training, revision of internal documents/processes, chargeable Witness Integrity Audit and/or Certification Body Integrity Audit	1	From the 3rd significant violation, violations (warning) are classified as major violations.
Major	Training, several chargeable Witness Integrity Audits and/or a Certification Body Integrity Audit	3	

2 Consequences of accumulated penalty points

The penalty points for violations of the same type and different types will be added up.

2.1 Penalty points ≥ 3

If 3 or more penalty points are accumulated within one year (starting from the date on which the first violation was found), the VLOG head office will impose/initiate the following further actions at its discretion:

- Requiring individuals or groups to participate in internal or external VLOG training
- Conducting a VLOG Certification Body Integrity Audit
- VLOG head office review of VLOG customers' audit documents at the affected certification body
- Conducting a Witness Integrity Audit (to accompany VLOG audits at customers of the certification body)

The costs for the respective action will be the responsibility of the affected certification body. The daily rate for VLOG employees or hired outside experts will be a flat rate of € 1,500 plus travel expenses and VAT.

2.2 Penalty points ≥ 6

Certification bodies that incur six penalty points will immediately be suspended for three months and may not conduct any VLOG certifications during this period. Following the expiry of the three-month suspension period, VLOG reserves the right to conduct a Certification Body Integrity Audit after about six months.

2.3 Penalty points ≥ 9

Certification bodies that incur at least nine penalty points or incur a suspension of at least three months and ≥ 3 additional penalty points within two years will immediately be referred to the Penalty Committee to consider whether further action or penalties may be necessary, e.g., an additional suspension of three months, termination of recognition as a VLOG-approved certification body.

Table 2: Consequences of accumulated penalty points

Penalty points	Penalty
≥ 3 penalty points within one evaluation year	Internal or external training, chargeable Witness Integrity Audits and/or Certification Body Integrity Audits
≥ 6 penalty points within one evaluation year	Certification body will be suspended for three months and may not conduct any VLOG certifications during this period.
≥ 9 penalty points or a suspension of at least three months and at least three additional penalty points within two years	The Penalty Committee is assigned to determine additional penalties, if necessary, e.g., a new temporary suspension or termination of recognition as a VLOG-approved certification body.

3 Handling of Suspensions and Contract Annulments

If a three-month suspension is imposed and recognition as a VLOG-approved certification body is terminated, the VLOG head office will make a case-by-case decision (depending on the type and scope of the violation) of the consequences this action may have on the following aspects:

- Issuance of certificates for audits already conducted
- Validity of audits already completed
- Validity of certificates already issued
- Ongoing certification procedures (e.g., within the context of group or matrix certification)
- Planned follow-up audits and extension audits

4 Evaluation Year

An evaluation year begins on the date the first violation is found.

The date assigned to the violation and/or the assessment of penalty points is the date on which VLOG first gives the certification body written notice of the violation or the assessment of penalty points.

5 Expungement of Penalty Points

After the expiry of the evaluation year for a particular violation, the penalty points for the violation will be expunged. A new evaluation year will begin on the date a new violation is found.

Example

- A significant violation is found on 20 March 2019 → assessment of one penalty point. This penalty point will be expunged after the expiry of the evaluation year on 20 March 2020.
- An additional significant violation is found on 13 October 2019 → assessment of one penalty point. At this time, the sum of the penalty points is two.
- A major violation is found on 10 January 2020 → assessment of three penalty points. At this time, the sum of the penalty points is five. Since the sum of the penalty points is five, the VLOG head office will take further action in accordance with section 2a.

- One penalty point for the violation of 20 March 2019 will be expunged on 20 March 2020. At this time, the sum of the penalty points is four.

After a suspension of at least three months or termination of recognition as a VLOG-approved certification body, all penalty points will be expunged (see 2c for an exception). A new evaluation year will begin on the date a new violation is found. Following the expiry of the three-month suspension period, VLOG reserves the right to conduct a Certification Body Integrity Audit after a reasonable period of time (about six months).

Schedule of Penalties for VLOG Auditors' Violations

VLOG penalty actions are always a case-by-case decision. The first step in each case is to review whether there is a violation by the certification body responsible for the auditor. If the review indicates that the violation is solely the auditor's responsibility, only the auditor involved, and not the certification body, will be penalised in accordance with the following procedure:

1 Types of Violations

Violations of VLOG rules and VLOG Standard specifications are divided into three levels of severity:

- minor violations
- significant violations
- major violations

1.1 Minor violations

If a minor violation is found, the VLOG head office will issue a written warning to the auditor with a request to take all necessary actions to avoid a recurrence. The certification body that assigned the auditor will be notified of the written warning issued to the auditor.

No penalty points are assessed for minor violations; however, the third and every additional minor violation within a year will be considered significant violations under section 1.2 (even if they are different violations). The legal consequences set forth in section 1.2 will apply.

1.2 Significant violations

If a significant violation is found, the VLOG head office will issue a written warning to the auditor with a request to take all necessary actions to avoid a recurrence. The certification body that assigned the auditor will be notified of the written warning issued to the auditor. Evidence of compliance must be presented to the VLOG head office in a timely manner (e.g., by submitting a training certificate). In addition, one penalty point will be assessed. The third and every additional significant violation within a year will be considered major violations under section 1.3 (even if they are different violations). The legal consequences set forth in section 1.3 will apply.

1.3 Major violations

If a major violation is found, the VLOG head office will issue a written warning to the auditor with a request to take all necessary actions to avoid a recurrence. The certification body that assigned the auditor will be notified of the written warning issued to the auditor. Evidence of compliance must be presented to the VLOG head office in a timely manner (e.g., by submitting a training certificate). In addition, three penalty points will be assessed.

Table 1: Consequences of minor, significant, and major violations

Type of violation	Penalty action (examples)	Penalty points per violation	Penalty action in case of recurrence (within one year)
Minor	Written Warning	0	From the 3rd minor violation, violations (warning) are classified as significant violations.
Significant	Training, chargeable ¹ Witness Integrity Audit	1	From the 3rd significant violation, violations are classified as major violations.
Major	Training, multiple chargeable ¹ Witness Integrity Audits	3	

2 Consequences of accumulated penalty points

The penalty points for violations of the same type and different types will be added up.

2.1 Penalty points ≥ 3

If 3 or more penalty points are accumulated within one year (starting from the date on which the first violation was found), the VLOG head office will impose/initiate the following further actions at its discretion:

- Participation in internal or external VLOG training
- The VLOG head office will review the audit documents for VLOG facilities that were audited by the auditor involved. The audit document review will be equally distributed among all affected certification bodies.
- Witness Audit by the certification body or by VLOG

The costs for the respective action will be the responsibility of the affected certification body, but certification bodies will only be billed for costs that are directly connected to the auditor's activities for the certification body. The daily rate for VLOG employees or hired outside experts will be a flat rate of € 1,500 plus travel expenses and VAT.

2.2 Penalty points ≥ 6

Auditors who incur six penalty points will immediately be suspended for three months and may not conduct any VLOG audits during this period.

2.3 Penalty points ≥ 9

Auditors who incur at least nine penalty points or incur a suspension of at least three months and ≥ 3 additional penalty points within two years will immediately be referred to the Penalty Committee to consider whether further action may be necessary, e.g., an additional suspension of three months or more.

¹ Cost to be invoiced to the relevant certification body.

Table 2: Consequences of accumulated penalty points

Penalty points	Penalty
≥ 3 penalty points within one evaluation year	Internal or external training, chargeable Witness Integrity Audit and/or Certification Body Integrity Audit
≥ 6 penalty points within one evaluation year	Auditor is suspended for three months and may not conduct any VLOG audits during this period
≥ 9 penalty points or a suspension of at least three months and at least three additional penalty points within two years	The Penalty Committee is assigned to determine additional penalties, if necessary, e.g., a new temporary suspension

3 Handling of Suspensions and Contract Annulments

When a three-month suspension is imposed, the VLOG head office will make a case-by-case decision (depending on the type and scope of the violation) of the consequences this action may have on the following aspects:

- Issuance of certificates for audits already conducted
- Validity of audits already completed
- Validity of certificates already issued

4 Evaluation Year

An evaluation year begins on the date the first violation is found.

The date assigned to the violation and/or the assessment of penalty points is the date on which VLOG first gives the relevant certification body and the auditor written notice of the violation or the assessment of penalty points.

5 Expungement of Penalty Points

After the expiry of the evaluation year for a particular violation, the penalty points for the violation will be expunged. A new evaluation year will begin on the date a new violation is found.

Example

- A significant violation is found on 20 March 2019 → assessment of one penalty point. This penalty point will be expunged after the expiry of the evaluation year on 20 March 2020.
- An additional significant violation is found on 13 October 2019 → assessment of one penalty point. At this time, the sum of the penalty points is two.
- A major violation is found on 10 January 2020 → assessment of three penalty points. At this time, the sum of the penalty points is five. Since the sum of the penalty points is five, the VLOG head office will take further action in accordance with section 2a.
- One penalty point for the violation of 20 March 2019 will be expunged on 20 March 2020. At this time, the sum of the penalty points is four.

All penalty points are expunged after a three-month suspension (for an exception, see 2c). A new evaluation year will begin on the date a new violation is found.